

# INTEGRISPORT NEXT PRACTICAL GUIDE

The IntegriSport Next Practical Guide is a document with an operational and a strategic focus, targeted towards Law Enforcement and Judicial professionals, including technical knowledge for investigating and prosecuting sport-manipulation cases. The document is also aimed for exposure to stakeholders who were unable to participate in the project training sessions and to a wider audience. Transferability was a key objective. The Guide contains general information on the sport manipulation situation in the Program Countries, with special emphasis on their history, legal background and the aspects of manipulation. It summarizes project findings and provides general conclusions and recommendations on the gathered data. Feedback was welcomed from participants of the sessions, and was used to finetune the document during the project lifetime and maximize its potential usability and sustained impact. The document acts as a practical reference and guide.



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



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# INTEGRISPORT NEXT – PRACTICAL GUIDE



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**IntegriSport**  
**NEXT**

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**INTELLECTUAL OUTPUT 13**

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## Foreword

Dear all,

I am delighted to present, on behalf of the CSCF team, our experts and Integrisport Next project partners, this Practical Guide on addressing Investigations and legislation on the topic of criminal risks related to sport manipulation.

The Guide was prepared over the course of this 2-year, EU-co-funded project, with the involvement of our national project partners, including ministries, law enforcement and judiciary from Cyprus, Malta, Greece, Sweden, Georgia, and Finland, as well as our research partner, KU Leuven and our international partner, GLMS, now known as ULIS. We were delighted to receive support of FIFPRO, the professional football players' union and the Council of Europe, the organisation at the origin of the Convention on the Manipulation of Sports Competitions.

The concept of Integrisport was developed after a decade of experiences that led to the establishment of CSCF Foundation for Sport Integrity and the Consulting branch in 2017. The concept became reality when the EU funded it through the ERASMUS+ programme, running in the form of 2-and soon 3- editions in Europe since 2019. I am proud and grateful at its impact on the law enforcement community as well as raising awareness of the challenges faced by this community.

Finally, I am grateful and proud to announce that CSCF is furthering its innovative Integrisport Concept to more partner countries through a third European EU-funded edition. **Integrisport 3.0** will run until the end of 2024 and will build on the lessons learned and the experiences of CSCF team and their expert partners, providing a platform on which to continue to grow the Integrisport Concept. **As a result of Integrisport 3.0, CSCF and our partners will have provided customized and comprehensive awareness raising for law enforcement agencies and judicial authorities within almost 2/3 of the EU countries by the end of 2024!**

For now, I invite you to consult the **Integrisport Next Practical Guide**, the development of which **I thank the valuable contributions of our team, our partners and experts**, and we hope that the information based on the experiences of our partner countries, organisations and ourselves will serve as a useful tool for your work in combating sport manipulation.

Sportingly Yours,

CSCF Foundation Director  
Norbert Rubicsek



## About CSCF

CSCF – Foundation for Sport Integrity is part of the [CSCF Sport Integrity Group](#) with offices in The Netherlands, and Hungary. The Foundation was the first to be established in 2017 by Dr. Norbert Rubicsek, a lawyer and former police officer (Lt. Colonel of the Hungarian Police) and Intelligence analyst at Europol's now-named unit AP Sports Corruption, of which he was a co-founding member and Europol delegate to the Interpol Match-fixing task force. Dr. Rubicsek, has over a decade of investigating organised and financial crime through sport and coordinating international investigations, as was part of the 5-country landmark 2012 Joint investigation Team of the Bochum – [JIT VETO- Case](#), involving over 380 fixed football games. Now CSCF boasts a team of 8 with strong backgrounds in law enforcement, sports ethics, sports law, and sports integrity academia. We are committed alongside our pool of experts to the integrity and values of the sporting world. These integrity issues inevitably impact society at large and therefore must be preserved, monitored, and protected.

Our efforts are aimed at helping the actors of the sports ecosystem with tailored tools to be better equipped to face the challenges coming from integrity breaches that, although known by the sporting domain, have become a growing problem at various levels in recent decades, ranging from unethical to illegal behaviours.

Over the last four years we have developed/coordinated/delivered/been involved in projects and activities with:



The CSCF Sport Integrity Group is also a proud [associate member of ULIS](#) – United Lotteries for Integrity in Sport (formerly GLMS) since 2022.

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# The Integrisport Concept

The **Integrisport Program**, as a concept, has been developed and organized by CSCF to facilitate the handling, the threat of sport manipulation at the investigative and prosecutorial levels, primarily those threats that affect the criminal domain.

The concept was developed since 2017, building on the expertise of CSCF Director, Norbert Rubicsek, a former law enforcement (judicial) officer who was involved in one of the largest transnational investigative teams addressing match-fixing, the JIT VETO (Bochum Case) in the early 2010s. The concept continued to develop and be fed by special experts in the field as it was awarded funding, first in 2019, then in 2021 and now in 2023, by the European Commission, to contribute to the development of the expertise of law enforcement officers and judicial authorities in recognising, understanding and effectively tackling criminal risks related to sport manipulation.

Understanding well the international nature of the issue of sport manipulation, CSCF has also been developing the concept beyond Europe.

## *From Integrisport Erasmus+ to Integrisport 3.0 (2019-2024)*

Having been implemented in 11 European countries thus far, with funding from the Erasmus+ program and contributions from over 19 partner organizations, plus a further 260 organizations linked directly and indirectly, with high-profile experts in the field of sports integrity, over 400 law enforcement officers and other stakeholders have benefited from the project outcomes. These results speak for themselves in the successful implementation of the program, making it a case study to highlight in the fight to protect the integrity of the sport targeting a unique stakeholder group.

The European editions of these projects associated with the Program are the first of their kind to focus on raising awareness within the Law Enforcement and Judiciary community about the criminal issues in and around sport manipulation, using an extensive research workflow to collect and measure related practices, experience, and expert opinions. As a result of this program, partner countries have reported an enhanced capacity to cooperate, investigate, recognise and understand sport corruption cases and, as a consequence, have more tools to potentially take more cases to the criminal courts, participating with increased confidence in other activities and projects targeting their development and involvement in tackling sports manipulation.

**Integrisport Erasmus+, the first edition** of the Integrisport Program in Europe, endeavored to strengthen mutual cooperation techniques on developing criminal investigations, between law enforcement agencies, the judiciary, and organizations responsible for sport and sporting competitions, and endeavored to ensure the institutional and legal preconditions for the protection of whistleblowers of corruption. The project emphasized that addressing sport manipulation requires the involvement of law enforcement, mutual support amongst various stakeholders in and out of sport, and the integration of interests. Several international organizations and institutions have benefitted from the Integrisport Program as shown by the outcomes of this initial project. The project demonstrated a necessity for adopting effective tools to enable a coordinated approach to deal with this crime and its negative impacts and highlighted concretely the critical role of the judiciary and law enforcement. One of the main outputs of the project was the publication of an in-depth [Handbook](#).

The project partners of the Integrisport Erasmus+ 1<sup>st</sup> edition included representatives of:



**Integrisport Next ran from 2019 to 2021 and was based on the experiences of the first edition.** Thus, Integrisport Erasmus+ continued to make a larger impact in Europe, receiving funding once again from the EU ERASMUS+ programme. The second edition, which ended in December 2022, and on which this Practical Guide is primarily based, provided theoretic and practical support for law enforcement and judicial authorities in Cyprus, Malta, Greece, Sweden, Georgia, and Finland to fight against sport manipulation and corruption in sport. The project provided a unique opportunity to connect with law enforcement officials and prosecutors in investigating sports manipulations, to learn about their prior experience, best practices, and opinions. One of the key outcomes achieved was to provide these countries with the information and knowledge to handle sports manipulation cases and be more effective in future investigations through practical and concrete support. Another key outcome included creating effective cooperation between private and public organizations at national and transnational levels. The project also succeeded in crossing over its two editions, with exchanges of best practices from countries of the first project, highlighting the enduring impact of the project.

Integrisport Next thus helped law enforcement and judicial authorities to understand the different approaches (policy, law enforcement, sport, betting, virtual currencies) of the phenomenon. The partners of the Project are listed below:



The final beneficiaries of both projects include the millions of European athletes and their families (whose exposure to such criminal pressure should be minimized); the sport fans and supporters; the honest and genuine bettors and betting organizations; the public trust; as well as sport-financing and government revenues throughout the European Union, within and beyond the scope of this project.

*A concept poised to expand further across Europe from 2023-2024: Integrisport 3.0*

Importantly, the Integrisport Concept will continue to impact countries beyond those already impacted through Integrisport E+ and Next. The success of the first two editions has motivated 6 further European countries (Austria, Romania, Estonia, Spain, Bulgaria, Greece) showing interest, resulting in the preparation of a third project, launched in January 2023.

CSCF is delighted to be furthering of its innovative Integrisport Concept to more partner countries through a third European EU-funded edition. **Integrisport 3.0** will run until the end of 2024 and will build on the lessons learned and the experiences of CSCF team and their expert partners, providing a platform on which to continue to grow the Integrisport Concept. As a result of Integrisport 3.0, CSCF and our partners will have provided customized and comprehensive awareness raising for law enforcement agencies and judicial authorities within almost 2/3 of the EU countries by the end of 2024.

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Coordinator	Country Partners	Partner Organisations	Supporting Partner
 FOUNDATION FOR SPORT INTEGRITY	 PLAY FAIR CODE INTEGRITY WINS  MINISTERUL SPORTULUI  HELLENIC REPUBLIC Ministry of Culture and Sports  ESTCIS Estonian Center for Integrity in Sports	 INEFC  GLMS GLOBAL LOTTERY MONITORING SYSTEM Now ULIS	 FIFPRO FOOTBALL PLAYERS WORLDWIDE



EU-funded Integrisport 3.0 Jan 2023 - Dec 2024 coming soon! 



## Acknowledgements

CSCF Sport Integrity Group, notably the CSCF Foundation for Sport Integrity, has developed and been coordinating a unique educational concept, IntegriSport, since 2019. This project is the first of its kind that focuses on providing theoretical and practical support to Law Enforcement Agencies and Judicial Authorities to fight against match-fixing and related criminal activities, hereafter referred to as sport manipulation<sup>1</sup>, and corruption in sport. IntegriSport helps these groups understand the different approaches to the phenomenon to lead effective investigations and prosecution activities, as well as to create effective cooperation between public and private organizations at the national and international levels.

The concept has been implemented in Europe through two projects since 2019 as EU funded projects, and the concept is projected to be consolidated as a permanent project between the 14 participating stakeholders. The successful program concept has already been approved for EU-funding for a third edition in a further 6 European countries and will run until 2024, thus impacting 2/3 of Europe within 5 years and we thank sincerely the project partners, past, current and future, for all their hard work and involvement in making the project a success.

The Project involved a strong team of experts, selected and coordinated by CSCF, and who were deployed to support and contribute their expertise and knowledge to the project goals in various capacities. The experts invited by CSCF, Partners and Supporting Partners for the Awareness Raising Sessions and Closing Conference included Lorraine Pearman and Gergely Vesszős as CSCF project trainer. National contact points and experts who participated in the project representing the country partners included Jakob Uddeholt of Swedish Sports Confederation; Jouko Ikonen of Finnish Center for Integrity in Sports; Remo Perli of Estonian Police and Border Guard Board, Central Criminal Police, Corruption Crimes Bureau; Chryso Angeli of Cyprus Police, Teo Baramidze and Teona Asatiani of Ministry of Culture, Sport, and Youth of Georgia; Anthony Scerri, Wayne Rodney Borg and Brandon Agius of The Malta Police Force; the research team from KU Leuven included Mike McNamee, Andrea Petroczi, Alban Zohn, and Luke Cox; Luca Esposito, Cassandra Fernandes, Daniel Chan, Chris Yaakoubian, Brian Petersen and Benoît Borsato of Global Lottery Monitoring System (GLMS); Frederique Winia, Roy Vermeer, and Loïc Alves of FIFPRO; and other important contributors namely Sophie Kwasny, Nicolas Sayde, and Orsolya Tolnay of Council of Europe; Humaid Alameemi and Claudio Marinelli of INTERPOL; Evangelos Alexandrakis, International Olympic Committee; Alfredo Lorenzo of the Spanish Football Federation; Oscar Perez Peca of Spanish General Judicial Police.

CSCF wishes to recognize the valuable contributions of its staff member that in one way or another (directly or indirectly) support the success of this project, including, Caroline Martin, Laura Velazques, Laura Gardeva, David Urban, Prashant Kumar, Annamaria Veres, Erika Reyes Mõtyõs Dõdesi. And Norbert Rubicsek Director and Project Content Manager and Carlos Gutierrez IntegriSport Next Project Content Manager for ensuring the overall coordination and the substantive development of the entire project.

We would like to thank the different stakeholders, all participating LEAs and JAs and people involved in the project activities and the development of this Guide and we sincerely hope that it will serve as a useful tool for these groups in Europe and around the world to deal with crimes related to the manipulation of sports competitions.

# Introduction

This Practical Guide is based on the Integrisport Next Project that ran from 2021 to 2022, and this document aims to deliver clarification and insight into various areas of challenges, which are key to the fight against the manipulation of sports competitions, notably investigation, cooperation, coordination, sharing of information, legislative analyses, risk assessment.

The Guide is intended as a tool to better understand the situation in the partner countries of this edition of the project regarding sport manipulation, the remaining challenges they face, and the relevant suggestions. This Guide also summarizes the Integrisport Next project and its outcomes thus emphasizing the importance of the Integrisport Concept. The Guide is necessary as a culminative piece of the Integrisport Next project to better discover, investigate, prosecute, and prevent the criminality inherent to the sport integrity threat of sport manipulation based on the experiences of the beneficiaries themselves. The guide is most effective when consulted together with the [Handbook](#) produced at the end of the first edition of the project, that ran from 2019 to 20201.

The Practical Guide provides an introductory background on sport manipulation, and a brief description of the Integrisport Next project with an explanation of the project phases, their outcomes, and what those outcomes mean in context of the fight against sport manipulation. The Guide expands on the partner country's experiences, understanding the challenges, and lessons learned, and provides suggestions. The relevant stakeholders are identified, and their roles and responsibilities are highlighted. Overall suggestions are included to tie together the common themes of the project. The Guide is composed of research findings, project assessment tools, partner countries feedback, and the expert opinions of CSCF and their partners. Specific steps are emphasized in this Guide to better fight the threat of sports manipulation, and the remaining challenges and new threats for the partner countries are noted. The project's outcomes are aimed at long-term continuity and effect, which is supported by the creation of this Practical Guide.

The first project edition, IntegriSport E+ (2019-2020), brought together police authorities and their national platforms from 7 European countries (Ministry of Interior of the Slovak Republic, Judicial Police of Portugal and the Portuguese Football Federation, National Tax and Customs Administration and the Rapid Response and Special Police Force of Hungary, Lithuanian Sport Centre, Finnish Center for Integrity in Sports, Cyprus Police, Slovakia, and the Ministry of Security and Justice in the Netherlands). Likewise, IntegriSport Next (2021-2022) supported the Malta Police Force, Cyprus Police, Finnish Center for Integrity in Sports, Estonian Police and Border Guard Board, Ministry of Culture, Sport and Youth of Georgia, Swedish Sports Confederation, and the Global Lottery Monitoring System.

Integrisport Next took stock of the situation among law enforcement and judiciary of various countries and enhanced, through awareness raising sessions, the importance concrete activities and exchanges with other relevant national and international stakeholders. The Project thus helped law enforcement and judicial authorities to understand the different approaches (policy, law enforcement, sport, betting, virtual currencies) of the phenomenon. Practical support occurred through peer-to-peer meetings for law enforcement and judiciaries from different countries, allowing them to discuss investigative techniques and the use of legal instruments to be effective in the criminal procedure regarding match fixing. These sessions also provided an opportunity for law enforcement and judiciaries to invite various experts who could support their criminal procedures with expertise of law, law enforcement, sport, betting, and virtual currency.

The Guide details the project findings, from the research phase to implementation outcomes. Firstly, the research phase revealed that sport manipulation is a serious issue in the partner

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1 Integrisport ERASMUS+ 2019-2020 Handbook <https://www.integrisport.org/wp-content/uploads/2021/12/IO-15-Handbook-Integrisport-FV5-.pdf>

countries. The awareness-raising sessions were accordingly dedicated to disseminating the research findings to the countries and aiding them in understanding the mitigating factors of sport manipulation in their specific context.

The various transnational meetings worked towards building the necessary foundations for cooperation and coordination between the project partners and experts. As a result of the efforts of the Project, law enforcement and judicial authorities were educated on the typologies of sport manipulation, as well as the discovery, investigation, prevention, and prosecution of incidents.

There was a general recognition that legislation must have uniformity and should be extended to include the various typologies of sport manipulation that exist unrelated to manipulations of the betting market. New threats are also an area of concern, with cryptocurrencies and esports already proving to be areas of great concern.

Discovery and awareness of incidents has been the focus for the last decade, but law enforcement can bridge the gap between discovery to investigation to prosecution of cases in the court of law. To this end, several important results were achieved, from new units being established, to specialized courses being set up and legislation being improved, thanks to the project.

Thanks to the outputs and events that took place during the project lifetime, the Partners accepted and agreed that the role of law enforcement is indeed crucial. This was highlighted by the signing [of a Joint Statement](#) by all the country partners, ULIS (former GLSM) and FIFPRO recognizing the importance of tackling crimes related to sport manipulation and engagement to continue to maintain and increase efforts to this end.



Education and awareness building were deemed of critical importance, and these efforts must include all the stakeholders involved inside and outside of sport. The beneficiaries agreed and understood that efforts need to be made to improve cooperation nationally and internationally between stakeholders, with communication being a clear area of improvement.

# 1. The challenges of the Issue of Sport Manipulation

Sport manipulation is undeniably a part of the dark side of sports: the past, the present, and indisputably, its future. The commercial viability of sport and values related to its integrity are threatened by sport manipulation. This threat can arise from criminal sources outside of sport, as well as corruption within sport, which dismantles the sustainability and wellbeing of sport. The optimal way to try and stay ahead of the criminal curve is to understand the implications, be prepared with effective tools and to cooperate in a multi-stakeholder manner.

The commonly accepted definition of manipulations of sports competitions, as it is colloquially referred to, was famously labeled by former International Olympic Committee president Jacques Rogge as being the greatest modern threat to sport integrity given its global, complex, and persistent nature. The increased popularity of sport and the associated commercial gains from *inter alia* the betting market creates a tempting target for criminals seeking profit from the distorted events within, and outcomes of, sporting events. The high profits and low risks involved with manipulating contests means that competition manipulation now exists as an inescapable aspect of sporting reality. Unfortunately, it proves difficult to accurately estimate the extent of competition manipulation in sport. Prosecution records of sport manipulation are limited. Any unsubstantiated allegations are rarely documented because sport organizations only record the outcome of cases that go to trial. Nowadays, sport manipulation scandals make headlines, but secrecy, cultures of silence, and fear of reporting continue to mask the full extent of the problem.

Many definitions and typologies of sport manipulation exist. The Council of Europe in 2014 further defined manipulation of sports competition more broadly as:

"An intentional arrangement, act, or omission aimed at an improper alteration of the result of the course of a sports competition in order to remove all or part of the unpredictable nature of the aforementioned sports competition with a view to obtaining an undue advantage for oneself or for others"

This definition is widely accepted as being the leading definition to describe the scope of the phenomenon. Sport manipulation involves actions that distort the entire outcome, or a specific aspect of the outcome, of a contest. Manipulation in this sense should be understood as intentional and improper controlling or altering a sporting situation for private gain. Importantly, manipulation need not break the constitutive rules of the sport. The aim of manipulating the outcome of a contest can be differentiated broadly into a variety of categories. It englobes the concept of match-fixing, which, when interpreted in the pure sense of the term, refers to altering the course or result of the game on the field of play. Manipulation includes this aspect as well as the actions beyond the field of play, be it coercion, grooming or bribery that would lead to the action on the field of play.

Sport manipulation threatens the social, educational, and cultural values of sport promoted by sport governing bodies because it links sport to criminal activities like corruption and money laundering. The persistent link to criminal activities threatens the commercial viability of the economic product of sport. The economic damages from sport manipulation include loss of revenues to teams and federations, loss of sponsors, decreased government funding towards sport projects, harm to brand image, lack of athlete involvement, and decline in spectator demand for the product of sport. Football leagues in Thailand, Malaysia, and Vietnam were entirely disassembled due to problems with sport manipulation. Similarly, volleyball leagues across Asia collapsed amidst betting scandals. Sponsors and fans both equally shunned the discredited competitions. These dramatic consequences are a warning to sport governing bodies that sport can crumble from unchallenged competition manipulation.



## 2. About the IntegriSport Next Project (2021-2022)

### 2.1. Principal Project Aim

The Integrisport Concept focuses specifically on highlighting and supporting law enforcement and judiciary engagement against sport manipulation. The purpose of this is because criminal organizations are directly connected to, and responsible for the cases of sport manipulation discovered by many countries, which means that law enforcement has a role to play in combatting sport manipulation. Sport manipulation violates civil and criminal legal codes relating to fraud, bribery, and corruption in some countries. It is often driven by organized crime, it is fraudulent, and it is harmful to society at large. Legal policy efforts from national governing bodies could make an important difference in the fight against sport manipulation because they can apprehend and punish criminal instigators outside of sport's authority. Sport manipulation can no longer be considered a problem for sport to tackle alone, even if most law enforcement authorities believe that preventing sport manipulation is ultimately the responsibility of sport governing bodies. Law enforcement agencies and judicial authorities must bear a measure of responsibility because they hold the power to persecute criminals responsible for fixes, a power that sport governing bodies' lack.

### 2.2. Project Partners

The lead research point of contact from KU Leuven, Prof. Dr Mike McNamee, pointed out that the group of country partners was a fantastic geopolitical group that ensured awareness will be spread all over Europe because of Integrisport Next. Indeed, the project brought together a diverse group of law enforcement and judiciary approaching the subject matter, with input from even more countries beyond the partners and from the first edition, to create a truly Europe-wide exchange of best practices, boosted even further by the institutional partners.

#### **Coordinator:**

- CSCF – Counter Sport Corruption Foundation for Sport Integrity

#### **Country Partners:**

- 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

#### **Partner Organisations:**

- Katholieke Universiteit Leuven (KU Leuven)
- The Global Lottery Monitoring System (GLMS) / now United Lotteries for Integrity in Sport (ULIS)

#### **Supporting Partner:**

- Fédération Internationale des Footballeurs Professionnelles, Division Europe (FIFPro)

### 2.2.1. Project Coordinator

- CSCF – Counter Sport Corruption Foundation for Sport Integrity



This project was born of the coordinator's own concept of the same name. CSCF was responsible for coordinating and leading Integrisport Next, as well as providing expertise and inviting project partner countries. CSCF brought in and managed experts in a variety of disciplines in order to ensure project outcomes and benefit partner countries. These experts came from sporting organizations, academia, betting authorities, judicial bodies, and law enforcement.

The knowledge of CSCF, experience from previous Projects, their ability to coordinate and manage partners, and the expertise of its team was critical for the project's success. For example, the theme and target beneficiaries were chosen thanks to CSCF's direct experiences working in the field of law enforcement and sport integrity.

### 2.2.3. Country Partners

The Cyprus Police Αστυνομία Κύπρου



The Cyprus Police was established in 1960 and is the only National Service of the Republic of Cyprus and operates under the Ministry of Justice and Public Order since 1993.

Estonian Police and Border Guard Board Politsei- ja Piirivalveamet



The Police and Border Guard is a unified governmental agency within the Estonian Ministry of Interior and is responsible for law enforcement and homeland security in the Republic of Estonia.

Finnish Center for Integrity in Sports (FINCIS) Suomen Urheilun Eettinen Keskus (SUEK)



The Finnish Center for Integrity in Sports (FINCIS), is responsible for advocating for ethical principles in Finnish sport, carrying out activities in prevention of sport manipulation, antidoping activities and spectator violence, among other things. In an extraordinary general meeting held recently, the members of the Finnish Antidoping Agency FINADA accepted amendments to the rules of the Agency. As a result of the amendments, the duties of the Agency were extended, and the name of the organisation was changed.

#### The Ministry of Culture, Sport, and Youth of Georgia



(Formerly the Ministry of Education, Science, Culture and Sport). By Government Decree Ministry of Justice of Georgia has established Anti-Corruption Council and Ministry of Culture, Youth, and Sport of Georgia. Eliminating corruption in the field of sports is one of the prominent issues that the Ministry of Culture, Youth and Sport of Georgia is focusing on and through inter-agency cooperation the Ministry is working to eliminate the given disadvantages of the sport. To this end, the Ministry actively cooperates both at national inter-agency and international levels. This is confirmed by Georgia's cooperation with the Council of Europe and its sub-committees.

#### Malta Police Force Il-Korp tal-Pulizija ta' Malta



Part of the Economic Crime Unit, within the Malta Police Force tackles sports related crimes such as sports manipulation and corruption. The Malta Police have a mixed responsibility in respect of its investigative role and national security. The role of a police officer includes the preservation of public order and peace; the prevention, detection, and investigation of offences; and the collection of evidence against offenders.

#### Swedish Sports Confederation Riksidrottsförbundet(RF) - Sweden



The Swedish Sports Confederation, Riksidrottsförbundet(RF), is the central organisation for the sports movement in Sweden. RF has 19 districts and 72 affiliates (specialized sports federations, SF) which together have about 19000 sports associations. In total, the sports movement brings together more than 3.1 million members.

## 2.2.4. Expert Partners

Academia - KU Leuven - Katholieke Universiteit Leuven

### KU LEUVEN

KU Leuven is currently by far the largest university in Belgium in terms of research funding and expenditure (EUR 476 million in 2018) and is a charter member of LERU. KU Leuven conducts fundamental and applied research in all academic disciplines with a clear international orientation. In the Times Higher Education ranking KU Leuven is ranked as the 14th European university, while in the Reuters Top 100 of the World's most innovative institutions, KU Leuven is listed as the first European university, for the fourth year in a row.

In Horizon 2020, KU Leuven currently has been approved more than 450 projects and is ranked fifth HES institution regarding number of signed grants (417, worth more than 228 million euro). KU Leuven takes up the 11th place of European HES institutions hosting ERC grants (as first legal signatories of the grant agreement). To date, the over 100 ERC grants involving KU Leuven researchers, (including affiliates with VIB and IMEC) confirm that KU Leuven is a breeding ground and attractive destination for the world's best researchers.

Betting - The Global Lottery Monitoring System – GLMS / *United Lotteries for Integrity in Sport (ULIS) Association (at the GLMS GA of 2022 in Vancouver, GLMS' name was officially modified to ULIS –but for this guide, will still be referred to as GLMS)*



The integrity of sports and sports betting is critical to the ethos, reputation and commercial viability of sports. We at ULIS are dedicated to helping lotteries protect the integrity of sports competition. We act as a beacon, helping lotteries navigate and proactively manage the complex world of sports and act decisively even under great pressure.

The United Lotteries for Integrity in Sport (ULIS) is an international non-profit association of state lotteries conceived to safeguard the integrity and core values of sports. ULIS thought its lottery savvy network manage betting integrity in sports.





The ULIS provide a complete set of services under one roof:

- Education, training, knowledge building
- Networking and events
- Stakeholder influence & management (law enforcement, regulators, sports prosecutors, sports leagues-federations-organizations)
- Monitoring & detection, analysis, reporting, collaboration



### 2.2.5. Supporting Partner

Athletes - FIFPro - Fédération Internationale des Footballeurs Professionnelles, Division Europe.



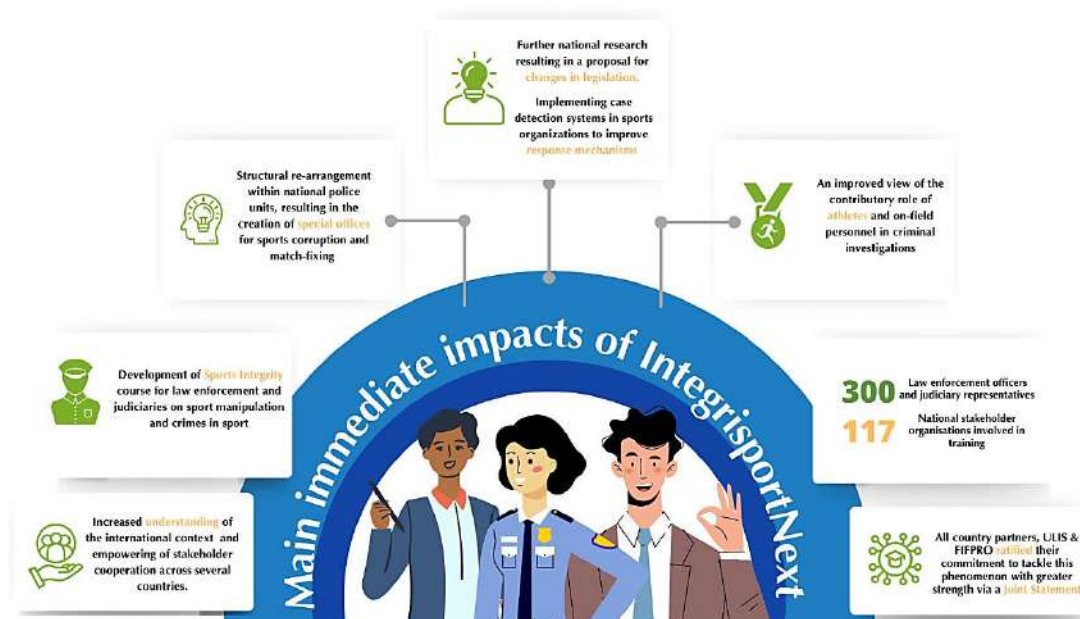
FIFPro is the worldwide representative organisation for all professional footballers. FIFPro represents more than 65.000 players, male and female, worldwide. Currently 65 national players' associations are an official member of FIFPro. Several candidate members and observers are connected to the organisation as well. The mission 'FIFPro supports players' and the mission statement 'FIFPro is the exclusive collective voice of the world's professional footballers' underpin all the activities undertaken by FIFPro.

Since 2012, FIFPRO has been fighting match fixing in football. During the last years, FIFPRO organized several programmes to raise the awareness of the dangers of match fixing amongst the players but also to educate the players. As match fixing is still existing in professional football, FIFPRO is committed to continue the fight against match fixing. Currently FIFPRO is in the last phase of the launch of a reporting tool on match fixing for its members. The tool is called the Red Button App and it enables the player to send a report (if necessary, anonymously) on an approach of match fixing. Together with the tool comes again an education part, player union representatives will address the dangers of match fixing in the dressing room visits and will make sure that the Red Button App will be downloaded on their phones. The App itself also contains education materials like video clips.

## 3. Main Activities, Outcomes and Good Practices within the project

The following section describes a series of main outcomes and good practices based on the Project findings. These practices are based on the tools used to accomplish the Project goals, which will be described below.

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### 3.1. Project Research

#### **Desk Research**

A comprehensive desk report was produced in September of 2021 by KU Leuven and built on the support of representatives of all local program countries. This report includes academic research involving a systematic review of the sport manipulation literature, analysis of media reports, legal documents, information provided by partners, and the various interviews and reports from the partner countries. The various researched and hands-on **outcomes** of the desk research provided a foundation for the entire project, supporting the work of the project experts in shaping the fact-finding missions, guided the Awareness Raising Practical Session (ARPS), and informed the country's curricula.

#### **Fact Finding Missions (FFM)**

In parallel to the development of the desk research, fact-finding missions were coordinated by CSCF in each partner country in order to engage with the stakeholders in a more intimate, one-on-one setting to prepare for a constructive awareness-raising session.

The fact-finding missions involved experts conducting interviews with stakeholders (e.g.: ministries, judicial authorities, sport associations, betting regulators, etc) regarding the local situation, strategy, experience, and current practices. CSCF experts interviewed representatives of each Program Country and any other stakeholders who were able to contribute to the result of the report, with a central focus always remaining on the investigation and prosecution of sports manipulations. 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

#### **Surveys**

Surveys prior to and following awareness raising sessions formed an integral part of the information collection process, to take stock of the experience, awareness, knowledge, and views about investigations, prosecutions and understanding sport manipulation among the future participants of the Awareness Raising workshop. The surveys also evaluated opinions a period of time after the workshops to determine their impact.

Approximately 145 responses from the 6 partner countries were recorded, analyzed, and evaluated across the three surveys that were used during the Project.

### 3.2. Customised Curricula and Development of Communication Networks

A customized curriculum was developed for each of the awareness sessions based on the research performed in the preceding phase. The curricula explained all relevant aspects of the situation of sport manipulation in each country. The key topics covered in the curriculum (Policy making, Sport Integrity, Law Enforcement and Prosecution, Betting Industry, Cybercrime and Virtual Currencies) promoted an integrated approach focusing on how to investigate, prosecute and judge criminal activities in sport manipulation more effectively.

After developing the customized pedagogical materials, the CSCF experts were deployed to each country to deliver a multi-day workshop (Awareness Raising Practical Session – ARPS)– based on the information gathered during the Preparation Phase. Each session culminated with the experts providing practical solutions and recommendations for sport manipulation in active collaboration with the partner country organization and representatives of local stakeholders.

Moreover, CSCF supported the building of connections between participants of the various local and foreign stakeholders in and across the partner countries, such as ministries and sport organizations. CSCF facilitated this communication network development by introducing stakeholders to one another, engaging the participants in open dialogue across nations, and scheduling meetings for future collaboration and support.

### 3.3. Operational/Practical Support

The Practical Support provided by the Integrisport Next project was critical for the project to achieve its goal of supporting the target group: Law Enforcement and the Judiciary. The practical support consisted of Awareness Raising Practical Sessions (ARPSs) and peer-to-peer meetings that occurred in each country. CSCF coordinated activities that educated law enforcement and the judiciary specifically, while evaluating the situation in each country. The Operational support had two key goals:

- Sharing knowledge on key modules, namely Policy making, Sport Integrity, Law Enforcement and Prosecution, Betting Industry, Cybercrime and Virtual Currencies, involving international and national experts, seminars, and case studies
- Enabling and promoting transnational cooperation to support law enforcement and the judiciary in tackling sport manipulation.

Furthermore, the other stakeholders participating in these meetings learned how they could assist and support law enforcement to combat this problem. These sessions were supported by presentations and exchanges by local and international experts, namely CSCF; the project partner; local speakers; the Global Lottery Monitoring System (GLMS)/United Lotteries for Integrity in Sport (ULIS); the supporting organisation FIFPro; and Interpol and the Council of Europe, who were supporters of the project. The ARPSs 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.

### 3.4. Improving Awareness

The research conducted during the project and the awareness raising sessions led to increased knowledge of the situation in each partner country and a better understanding of 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.).

Awareness raising is not an isolated activity. This was revealed during the second edition of the project through the comprehensive desk research, preparation activities, and evaluation instruments that took place.

Awareness building must aim to understand the situation nationally regarding investigation and prosecutions, this includes:

- Understanding the existing legislation and the gaps
- Understanding how different relevant stakeholders approach the situation and to what extent they are able /want to do so
- Understanding how others address the issue
- Working jointly to develop strategies built on best practice and research



## 3.5. Overall Conclusions and Recommendations

### 3.5.1. CSCF Conclusions

The conclusions of the CSCF expert team are based on the project outcomes and developments and are meant as a guide based on the project experiences for the readers and for other countries.

a. The typologies of sport manipulation must be understood as including those that do not only involve betting as a manipulation-motivating factor. The supposed distinction of betting and non-betting manipulated sport poses a significant issue given that the participants of the events still think that the manipulation of sport competition is almost always linked to betting, which results in very narrow legislation, restricting the scope of investigations for law enforcement as well as ensuing admission to court for prosecutions.

Many cases do involve betting in some form. Yet, as long as we continue to think that cases tend to involve betting as the motivational factor rather than – as has often been shared in the project events- a side effect/consequence of a different primary motivation, there will continue to be a lack of completed cases. This limited interpretation of causes for sport manipulation filters into both law and practice in countries, which means that if sport manipulation occurs without any sign of betting then it may not be recognized as sport manipulation nor prosecuted as sport manipulation. This cycle is worrisome, as the lack of non-betting-motivated cases reinforces the idea that all cases involve betting. An active recognition of the vast typology of sport manipulations that do not involve the betting market is necessary, which should be reflected in practice and through legislation. The way sport manipulation is defined clearly has implications for how it is addressed by various countries, and non-betting related sport manipulation must be taken seriously and perhaps otherwise defined. A useful reference is the Council of Europe's Typology, developed in detail by countries from its Group of Copenhagen. CSCF was involved in the early stages of this development.

b. Esports are a worrying new field for sport manipulation, and one that is in recent years increasingly being exploited by criminal networks. The level of scandal is currently low, but the factors that are present are worrying. The risk factors are high, especially as the organizational ecosystem of e-sports is disjointed, and the regulations in place are still insufficient, inexistent or inconsistent to combat this threat yet. The focus of sport manipulation is largely on football, but there must be a recognition of other sports that face sport manipulation, as well as those sports that are at a higher risk of criminal involvement for sport manipulation, such as individual sports or those sports outside the media focus.

c. Cryptocurrencies are part of a mechanism that renders the discovery of sport manipulation even more difficult. Their common acceptance nowadays makes this even more worrying, with some cryptocurrencies even sponsoring high-level sports teams. Merely defining cryptocurrency as a legal tender is a challenge in itself, and without their recognition of value as a currency, the chances of prosecuting sport manipulation involving cryptocurrencies remains difficult. In addition, anonymity is one of the most tempting factors of cryptocurrencies for ill-intentioned persons or groups. Organized criminal networks could, and are likely already, utilizing cryptocurrencies to place their bets on manipulated outcomes, which makes it difficult for law enforcement to trace the source of illicit bets. In addition, bribes made with cryptocurrencies are similarly difficult to trace. Their use makes the enforcement of investigations against sport manipulation increasingly challenging.

d. Investigations and prosecutions are limited. Most of the focus in sport manipulation has been on awareness and discovery, but it is time to move towards securing convictions and improving the investigative techniques used by law enforcement around the world. There are examples from the partner countries of policing tactics that can address cases of sport manipulation. Similarly, there are examples of successful prosecutions. However, we have noticed that the majority of cases discovered are not prosecuted, and if they are prosecuted or sanctioned by

sporting authorities the penalties are minimal. The deterrent effect of regulations for sport manipulation is therefore rated as exceptionally low, although not useless, by our experts.

### 3.5.2. Common Risk Factors

The following table outlines the relevant risk factors noted by the partner countries.

	Sweden	Estonia	Finland	Georgia	Malta	Cyprus
Underpaid Referees		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Underpaid Players	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Financial Difficulties of Clubs	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Youth Games/Lower Division Games	<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Inconsequential Matches (end of season)					<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Salary Delays		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Omertá		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Less Media Attention on Competition	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Less Attendance in Stands	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
League Play During Summer Months	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
Normalization of Corruption/Gift Giving		<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Foreign Players in League		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>
Lack of Reporting Mechanisms	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>
Lack of Betting Restrictions		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
E-Sports Betting	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Small Country	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Fear of Reporting/Weak Protection	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Denial of the Problem	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Legislative Weakness	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Popularity of Betting	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

The partner countries all listed a variety of risk factors during the Fact-Finding Missions, and others were discovered during the desk research and discussed during the ARPSs. Highlights include:

a. Cases in multiple partner countries showed that players were being bribed massive amounts of money to manipulate events, and the sanctions and punishments did not appear enough to deter them. As such, the financial status of the sports leagues seems relevant when assessing risk in a cultural context. For example, the low salary, delayed salaries, and general financial state of the clubs in leagues are all risk factors for sport competitions manipulation in the partner countries.

b. In the case of football, none of the countries enjoy the prestige of participation in the more lucrative European leagues. The players, when offered monetary compensation for manipulating a match, will be much more likely to comply given their diminished financial situation. Additionally, clubs that seek funds to support their operations used sport manipulation to boost

their income. Discovering the corruption in these smaller leagues becomes difficult because there is little media review or attention paid on these leagues, especially in the lower divisions.

c. In light of the constraints of legislation and the issues mentioned in the overall conclusions above, most incidents that were reported in the partner countries involved sport betting, with only a handful of incidents noted that did not involve sport betting. Liquidity in the betting market is a friend of the fixer, and the partner countries are all characterized by a highly popular sport betting market. In addition, if a betting operator offers more options for sports betting without appropriate analysis or protection measures in place, there are more opportunities for manipulation to occur. This includes betting on youth team games, amateur matches, lower divisions, and friendlies, which are all high-risk for vulnerability to sport manipulation. In addition, live or “in-play” bets are thought to be high-risk for manipulation as well because of how hard it is to monitor those types of bets.

d. The culture of silence that exists in some of the partner countries was also a factor in the incidents of sport manipulation. Low levels of reporting are thought to be responsible for the fear of speaking out because of possible retributions, or belief that no positive outcome would come from reporting. Over time, corrupt organizations breed silence and coercion because the members of the organization assimilate to the pro-corrupt values and norms while facing internal pressures to conform and comply. Corruption in these organizations has become an open secret, which was expressed as a problem by members of the partner countries.

e. Cultural norms were a risk factor in every partner country. These norms extend beyond merely organizational culture. In countries like Estonia, Malta, and Cyprus, it has been suggested that rule-breaking is a normalized behavior in the broader cultural contexts. As such, citizens are unlikely to perceive corruption as especially problematic. The culture surrounding gift-giving and reciprocity of favors also was observed to make a difference in norms surrounding corruption.

### ***3.5.3. Recommendations***

The purpose of the Project was ultimately to support Law Enforcement Agencies and Judicial Authorities (LEA and JA) in the partner countries. The following list of recommendations surpasses merely addressing investigations and policy. The Project revealed that several stakeholders are necessary to support LEA and the JA with discovering, investigating, prosecuting, and preventing sport manipulation. Thus, the recommendations are derived from a holistic perspective of the problem, recognizing that LEA and the JA cannot address the problem on their own.

#### ***a. Law Enforcement Investigations***

There is a strong need to improve the investigations of incidents and methods to surpass the natural challenges faced by each stakeholder group. Frustrations were expressed by each partner country during the project surveys regarding the investigation of incidents. Difficulties were expressed in collecting evidence that can be used in the court of law. All member countries noted how challenging it is for cases to move beyond sport tribunals or disciplinary committees because of the problems with collecting evidence. Law enforcement in the partner countries lamented limited resources, while many sport authorities shared that they felt that the efforts from police are minimal because of a lack of commitment.

#### ***Law enforcement agencies need support from the legislature***

Legislative changes could provide law enforcement with additional tools and resources for investigation. If there is a lack of legal tools, then investigation and prosecution become more difficult. Legislation and regulations differ across countries and result in difficulties for police officers.

- Implementation of anti-sport manipulation measures that address multiple types of infractions related to sport manipulation should be introduced to the legal code, and it should include sanctions severe, swift, and certain enough to deter the crime.
- Introduction of foreign bribery in national criminal codes could be a useful step due to the transnational nature of sport manipulation: Foreign bribery involves providing or offering a benefit to a foreign public official, or causing a benefit to be provided or offered to a foreign public official, where the benefit is not legitimately due ([Foreign Bribery Factsheet](#))

#### *Improve tools of investigation*

- Technological supervision tools should be implemented or improved. This involves adopting legislative or other measures for cases of sport manipulation to secure electronic evidence through stored computer data, preservation and disclosure of traffic data, production orders, search and seizure of stored computer data, real-time traffic data and interception of content data. If they do exist, there are limits on their use because the criminal provision does not allow for them to be used in sport manipulation cases.
- The countries that were able to use surveillance, such as wiretapping, video surveillance and following suspects, proved useful in cases that occurred in Finland and Georgia.
- In Georgia, an undercover operative was responsible for discovering many of the cases that we know of today from that country. This single operative showed that undercover work by law enforcement can be extremely effective for collecting evidence that sports competition manipulation is occurring, as well as sanctioning and convicting the off-field individuals involved.
- Strategies adopted from police procedure for other financially motivated crimes, such as bank control permits could prove useful. This would offer better controls over financial transactions between criminal parties.
- A Financial Investigation Unit could also be involved through law enforcement, tracking the moving of money of suspicious persons.

#### *Law enforcement should pursue offenders in and outside of sport. International focus must be a priority*

- Arresting and sanctioning off-field individuals is as important as tracking down the offenders on the field.
- Determining the identity of the instigators of sport manipulation can crumble entire networks of organized crime. This was seen in the case of Finland after the arrest of Mr. Perumal.
- Special consent from the general attorney or other relevant authorities could be useful to make the case progress more efficiently.

#### *Develop a specialized police unit, such as an anti-sport manipulation unit*

- This could result in increased potential to generate higher conviction rates, which would be likely to improve cooperation from sport actors.
- The task force should comprise of a dedicated group that focuses solely on sport manipulation, which would allow officers to gain relevant expertise in those cases over time.
- This action improves the chance that officers will prioritize sport manipulation cases.
- The task force could publish guidelines on best practices in the investigation of incidents of sport manipulation.
- When successful investigations occur, the force would be able to share their methods with other specialized police units in other regions or countries.

#### ***b. Education and Awareness***

Partner countries mentioned that one of the main problems was the limited knowledge and interest from non-sport organizations. Law enforcement education was found to be crucial given a displayed lack of knowledge as to how to gather evidence from sport organizations, other stakeholders such as betting monitoring companies to build a prosecutable case



To address this awareness, education programs and workshops are a necessity. Improvements would include greater attention to the content of these educational programs, their target audience, who delivers them, and the sessions should regularly and rigorously be reviewed and evaluated.

A useful education session must include certain elements. The person delivering the sessions, and those receiving it must be deliberately considered. Similarly, the content of the sessions should be informed by current research findings and made relevant to the specific context in which the session is occurring. Not every education session can be the same; rather, the tools used in the sessions must be customizable to the audience, presenters, and other relative aspects of the national context. For example, some countries may have more of an issue with protecting player anonymity compared to others, so whistleblowing should be emphasized more in the education session. Those responsible for the education sessions should be responsible for the consideration of these elements.

### *c. Whistleblowing*

Unfortunately, cooperation and testimony from sport actors is not common in sport manipulation cases. Each of the partner countries expressed a need for more people to speak out about the issue within sport. Whistleblowing is a tool for discovering incidents and provides valuable evidence that can be used in the court of law and during sport tribunals. Whistleblowing is the disclosure by organization members of illegal or illegitimate activities to the relevant people or organizations that can address these activities. Some countries reported that in the absence of clear reporting line(s), or a proliferation of distinct reporting lines are likely to have contributed to ineffectiveness in this regard. Additionally, Sport actors fear retribution and reprisals, such as are a matter of record in Malta and Cyprus.

Consider implementing mechanisms to assist with whistleblowing

- phone lines, email addresses, or even apps (e.g. Red Button App)
- Make these mechanisms very visible and easily accessible

Consider sanctioning attempts at deterring whistleblowing

- specific sanctions for intimidation from fellow sport actors and violent threats
- publicity and investment from relevant organizations

Consider integrating whistleblowing into education program related to sport manipulation.

- The target audience for this should be players, referees, coaches, and any other sporting official.
- Focus on the benefits of whistleblowing for sport and for those involved.
- Explain the basic considerations of disclosing relevant information
- The regulatory bodies responsible for whistleblowing should be identified
- There should be one mechanism for all reporting

Greater protection of anonymity could allay fears of these players and referees of violent retribution, loss of jobs, ostracization from teams, and other forms of punishment

- Develop mechanisms amongst sport federations and at specific clubs to protect player anonymity
- Improving education of sport bodies so they recognize the importance of anonymity, as well as the difference of typologies of sport manipulation. There needs to be an understanding that sport manipulation is not always linked to betting
- Protecting the anonymity of whistleblowers should be assured for sport actors as investigations are ongoing, through to trial, and beyond.

Consider mandating reporting through legal obligations to report

- Sanction sport actors who do not report if an incident is uncovered (to an extent as other factors may play a role)

- Promise of immunity if a player comes forward and promises to testify in court.

Driving these changes in whistleblowing requires cooperation, which should be coordinated by a central body. For example, National Platforms could provide the model for a similar central body

- This central body would be the cooperative junction between law enforcement, judicial authorities, betting organizations, and sport organizations
- Can streamline the actual reporting process where they would be responsible for all the reports, implementing a centralized single reporting system for all sport actors.
- Promotes feelings of safety among referees and players about reporting because they are not reporting to their sport federation, who they may believe will do nothing at best, or punish them for reporting at worst.
- Can be responsible for education related to whistleblowing
- Following up on such reports with law enforcement could be their responsibility

#### *d. Legislative Change*

Legislative change must be a priority for many member countries. It is a widespread problem that legislation does not extend to all the various typologies of sport manipulations, perpetrators, or the goal of the manipulation offences are not clearly defined. This results in failures of prosecution in some cases. Participants from the partner countries expressed dissatisfaction with the current variety in the legislative landscape. Currently countries prosecute through fraud/bribery offences (Estonia, Georgia), corruption offences (Sweden, Finland), sport offences as part of criminal law (Malta), or sports corruption offences in their sports law (Cyprus).

Include a sport manipulation specific offence

- The European Parliament, through the European Commission, recommended all EU Member States to include sport manipulation as a specific criminal offence ([Match-Fixing in Sport: Mapping of Criminal Law Provisions in EU 27 p. 44](#))
- Research shows countries with specialized legislation related to sports competition manipulation investigate more cases can potentially have more success with prosecuting cases (Hallman et al., 2017; Petropoulos, 2018)
- A specified criminal offence would be a stronger deterrent and give more options for punishing incidents of sport manipulation

Uniformise the legal landscape

- Make punishments and definitions of sport manipulation more well-defined and the rules clearer to follow, with flexibility in sanctioning for the distinct types of manipulation
- Effort should be made to universalize these rules and sanctions across international borders
- This would improve efforts towards international cooperation, harmonization of legislation is recommended to be able to work across national borders in cases of sport manipulation that involve foreign nationals

Expand on fraud and bribery statutes most commonly used to punish manipulation.

- There are problems with non-specific, fraud/bribery-only legislation. It is difficult to establish precisely who or what is being damaged or harmed by the manipulation, who is receiving the advantage.
- Many of the incidents of sport manipulation occur transnationally. Criminal codes should consider adding foreign bribery as a separate penalty in their legislation if they do not have it

Provide better protection for whistleblowers, or at least some form of support network for whistleblowers.

- This could increase the likelihood of reporting, disrupting the norms of silence that exist in work

- Examples of whistleblowers that are celebrated instead of vilified may incentivize other whistleblowers

#### ***e. Sanctions***

It is a fundamental premise of criminal law that the prospect of punishment will deter crime. More severe, swift, and certain punishments are recommended. These punishments can be delivered by Judicial Authorities, and/or sport regulatory bodies.

Harsher punishments for sport actors

- Clubs could be held responsible through vicarious liability, as applies in Malta, to incentivize the clubs to make more of an effort to monitor and police what goes on under their authority.
- Severe financial sanctions
- Points being dropped from the league,
- Stricter player bans, such as being unable to play the sport at any level in any country. Bans could also be longer and cover more leagues and divisions. There should however exist an element of mitigated sanctions, depending on the individual situation.
- Sport authorities could consider bans and financial punishments for those who do not speak out, even if they are not directly involved in the manipulation.
- All punishments should be coherent and consistent

Certainty and swiftness of punishment improvements

- Sanctions need to be enforced by the relevant authorities
- Fewer pardons, charges dropped, and suspended sentences could be a goal
- Cases should be prioritized and expedited in order to punish the crime more swiftly

#### ***f. Cooperation***

There was a sentiment shared by the partner countries that the relevant authorities in their specific country are working separately, or not cohesively, against sport manipulation. Many of the common criticisms that have been aimed at regulatory bodies is that the integrity units or responsible organizations under-enforce or are reluctant to enforce. Similarly, different stakeholders collect information independently, and there were no mechanisms in place to share information. This is a problem because long-term success relies upon building a tailor-made plan for each country that considers the role and responsibilities of all stakeholders, nationally and internationally. Working separately rather than together inhibits success at fighting the problem effectively.

Improve cooperation at national level

- Emphasize communication and coordination between the local, judicial authorities, law enforcement, sport organizations, ethics committees, sport actors and betting industry.
- There should be points of contact locally between the law enforcement, and sport federations and gaming industry, coordinated by one body, such as a National Platform

Improve international cooperation

- Share successful and unsuccessful case studies from other jurisdictions and countries
- Cooperate on investigations occurring across borders – and ensure the legislation follows
- Share information on the distinct types of manipulation in sport, the diverse types of sports betting, the various elements of an investigation, money trails, and how evidence is collected – ensuring that the legislation is put in place to ensure that such exchanges can be official and therefore eventually admissible in court
- Personal contacts are helpful for building these types of relationships across organizations and subsequently making it easier to transfer information.

A National Platform (or similar body) is necessary as a single point of contact - and should be officialised at national level through legislation/decreed/regulation as appropriate

- The main objective would be to combat manipulation of sports competitions
- It would work to a) prevent, detect and sanction national or transnational manipulation of national and international sports competitions; and b) promote national and international cooperation against manipulation of sports competitions between the public authorities concerned, as well as with organizations involved in sports and in sports betting (Convention of the Council of Europe on the Manipulation of Sports Competitions CET215/ Macolin Convention– articles 12-13).
- It can develop a clear procedure for how to deal with an alert when it is raised, how to report a case, what information should be shared, and how to communicate that information with other authorities.
- It can have a point of contact from within law enforcement and judiciary who could engage with other stakeholders
- It can receive information and data from several sources on the same sport/person(s)/issue and distribute them with law enforcement and prosecutors.
- Its powers should also have a basis in law, moving from unofficial to giving it real authority in the legal space.

### ***g. Sport Authorities***

While there are allegations from the partner countries that sport manipulation is not a priority for law enforcement, members of law enforcement may disagree. Law enforcement speak frequently about the difficulty of working with sport officials who refuse to admit that sport manipulation is occurring. Hill (2013) claimed that 2% of observed investigations were initiated by sports associations while 40% were initiated by the police. The reports of the partner countries follow a similar pattern where many major cases were discovered by the efforts of law enforcement, rather than by other sport authorities or betting monitoring companies.

Risk assessments utilized by sport authorities

- Individual federations should develop strong risk-assessment strategies to identify, pre-empt, and manage risks to the integrity of their sports.

sport federations could consider enacting harsher penalties for clubs or teams.

- Vicarious Liability. If a club member is prosecuted in a case involving event manipulation, they can also be punished - even when they deny any knowledge of the manipulation action.
- Harsher punishments for offenders. Life bans, fines, and suspensions

Must be responsible for the sport actors responsible and involved in the manipulations that occur

- This could include players, coaches, doctors, managers, administrators, and more.

Transparency should be a priority

- They should consider assessing the current state of transparency regarding alert or piece of evidence sent to them by another stakeholder and consider enacting changes as may be necessary.
- Communication and follow-ups should be the norm so that, law enforcement, and the sport actors can trust that when sport federations have information, they will pursue next steps.

### ***h. Betting Industry***

For the sport betting industry, it is crucial to continue monitoring the betting market for irregularities, a strategy that has proven effective for discovering sport manipulation. Currently betting operators utilize betting-monitoring systems put in place by industry bodies (ULIS/GLMS, IBIA, etc.), sports organizations, and commercial monitoring companies. Betting operators also often have their own surveillance system to look for unusual movements across the betting markets. Unfortunately, these early warning systems that monitor the betting market cannot always guarantee completely successful identification of sport manipulations. Specifically, they are unable to identify smaller bets and cannot monitor the use of cryptocurrency. Additionally,

they cannot monitor the illegal and semi-legal betting companies in Asia, and this is where the role of the legislator, the law enforcement agencies and the judicial authorities comes in,

Betting authorities need to work with any relevant Ethics Committee, or a similar agency (i.e. a national platform) reuniting different stakeholders, including the police and judiciary.

- Enquiries need to be better enforced by the relevant stakeholders regarding the betting industry.
- If betting monitoring companies send in a report after an alert or series of alerts are picked up by their monitoring systems, then there needs to be transparency related to how that report is being followed up.
  - That follow up should be enforced by the national platform or an independent sport integrity unit separate from the sport federation itself.
- The regulatory authority should require betting operators to report suspicious movements in the betting market that they discover (i.e. articles 7, 10 Macolin Convention)
- Regulatory authorities can compel operators to report alerts and share those reports with a national platform or similar entity.

Improve betting monitoring

- Consider the betting odds *and* the betting volumes when trying to flag suspicious matches
- Monitor more matches at more levels, across more sports, more frequently
- Put in place KYC mechanisms to ensure that bets and money can be traced

Implement betting restrictions

- Restrict bets deemed to be of elevated risk for sport competition
  - youth league games, friendlies, amateur games, and games that have a direct impact on promotion and relegation.
  - Attempt to restrict bets on yellow cards, own goals, and other such actions easily manipulated.
  - Attempt to restrict bets on sports actors from betting on sport events or disclosing relevant information
- *Global 'Sportbet-Tobin' tax* with a variable tax rate. This strategy is inspired by the Tobin tax and the so-called "Coubertobin" tax. Andreff (2017) argues that we cannot intervene, regulate, sanction, fine, or tax illegal transactions in the betting market related to match-fixing. As such, the market for sport betting must be targeted. This tax would levy on the amount of betting gains, and would grow with the amount of betting gains above a certain threshold in order to restrict the number of bets placed by match-fixers.
  - The revenues of this tax could be directed towards preventative strategies, such as better surveillance systems of online sports betting.
  - The UN or World Bank could be responsible for levying the tax.
  - accountability for public taxation should never be under control of private bodies, but should always be the responsibility of a relevant public body



## 4. Partner Countries: Law Enforcement Investigations and Judicial Sanctions

The research and activities in Integrisport Next showed that knowledge about sport manipulation and awareness of its various typologies is fragmented amongst law enforcement and judicial authorities (LEAs and JAs) in most countries. Most countries do possess at least a basic awareness of investigating and prosecuting the crime committed with manipulating sport events. The main aim of Integrisport Next was to build upon this foundation for the LEAs and JAs of the Program Countries, not only in a single unit but across the spectrum highlighting the broad nature of the issue, in order for them to address sport manipulation. Their involvement is critical because the problem cannot be addressed by sport alone, which is evidenced by the struggles that sport federations across the EU

face in dealing with sport manipulation cases in recent years. The target stakeholder group also was led through the project, recognising the importance of cooperating with other internal units and national stakeholders in order to effectively investigate sport manipulation cases, while participating more actively in prevention activities.

The following section identifies the investigative powers, cases, and legislation of the partner countries. The role of LEA and JA is highlighted here to show the importance of this stakeholder group, which serves as a recognition that their involvement in combatting the crime of sport manipulation is crucial and necessary.

### 4.1. Cyprus

#### *a. Investigations*

The police do have certain powers related to sports manipulation given the changes made recently to better discover and investigate sports manipulation. For example, the police will be reinforced and allowed to eavesdrop on phone communications, and the special police unit that combats sport manipulation was increased to 13 members.

The discovery of incidents relies on monitoring the betting market and sometimes anonymous reporting through the Red Button App. If an alert is raised, a report is duly sent to Cypriot sport authorities by UEFA. The sport authorities then pass the information to law enforcement in order to take the next step to investigate suspected cases. This process involves efforts by the police, the Section for Combating Intellectual Property and Illegal Gambling, the National Betting Authority, as well as the Cyprus Sport Ethics Committee.

When an incident is discovered, police can also request from Court for an arrest warrant or search warrant, and afterwards their powers of investigation include:

- Confiscation of mobile phones, computers, and personal documents;

- Phone-tapping;
- Interrogation of suspects, as well as anyone who might be involved or holds information for a suspected incident; and
- Formally charge suspects to bring them before Court in cooperation with Attorney General's Office.

Fears of repercussion from reporting is a fundamental problem in Cypriot investigations. Players and referees have been dismissed and intimidated when whistleblowing occurs. Even when cases are investigated successfully, testifying before court is a daunting prospect for the sport actors who are not confident in the ability of the authorities to protect them and who fear repercussion.

#### *b. Legislative Development and Current Policy*

In 2020, Cyprus set up a legislative committee to draft new legislation to fight football corruption. The government is also working on a common law on all sports-related issues. A current issue with the legislation in Cyprus is that even though there are a significant number of reports of sport manipulation, authorities frequently

fail to identify suspects and secure convictions. Worryingly, when authorities approach a breakthrough, suspects have evaded prosecution through alleged political protection.

#### **The Law on Combating Manipulation of Sporting Events of 2017 (180(I)/2017)**

### **4.2. Estonia**

#### ***a. Investigations***

The case involving football teams JK Narva Trans and JK Tallinna Kalev (2011) is the only notable case involving Estonian players, and it was part of a betting fraud that involved teams in Estonia, Lithuania, and Ukraine. Players allegedly received money from a bookmaker in connection with games that occurred during the 2011-2012 season, including games in the Estonian top-flight and cup matches. The betting stakes were made in Asia, the people behind the fraud were most likely Russian, and the motive was to either launder or make money for criminal organizations.

The state prosecutor opened fraud investigations in 2011, and subsequently began proceedings against several players. It was discovered by the police, and then supported by evidence from betting monitoring, which showed Narva Trans football matches were being manipulated for gain in the betting market. Police discovered his involvement in the case completely by accident. Investigators were monitoring his phone after he threatened a police officer in an unrelated incident, and the police overheard him discussing sport manipulation. Investigators listened to conversations where Mr. Mihhailov, the conspirator, mentioned Narva Trans players specifically. The Estonian Football Association then sent the case to the Public Prosecutors office seeking criminal charges.

In 2014 the Tallinn Circuit Court ruled that the eight players accused by the Prosecutors office should be cleared of all legal charges. The court agreed that sport competition manipulation was underway, but Estonian laws do not consider sport competition manipulation a criminal offence. The court

This is a specific criminal legislation against sports manipulation. The goal of the Law is the protection of public interest from sports corruption. It applies to any person directly or indirectly involved in sporting events. This law and others related to it are listed in the Annex.

used the Gambling Act § 100 and could only try the incident as misdemeanor offence. This classification of the incident as a misdemeanor offence resulted in far lower punishments for those involved than has been witnessed in similar incidents of sport manipulation across Europe.

#### ***b. Legislative Development and Current Policy***

There is no specific law for sport competition manipulation in Estonia. Sport competition manipulation is covered under the fraud statutes in Estonian Criminal Code, but the terms lack specificity and are difficult to apply to sport fraud specifically. There is no specific instrument in Estonian civil law to deal directly with corruption in general, and as a result there are very few cases that reached higher courts. Estonia maintains that their criminal law provisions on fraud cover most, or at least, some types of conduct involved in manipulation of sports results. Unfortunately, it is difficult to know if this is accurate because there has only been one case. There is simply too little evidence of experience or best practice regarding the investigation or prosecution of sport manipulation.

An update was made in 2015 to the Estonian Criminal Code related to fraud, which broadened the scope of bribery statutes, and made foreign officials liable. Estonia signed the Macolin convention in September 2016, but it has not ratified the convention because, according to the Ministry of Finance, they are concerned about betting restrictions. They have set up a Corruption Prevention Council, as well as the Estonian Center for Integrity in Esports which are important steps for combatting the issue. See Annex for further legislative details.

### 4.3. Finland

#### ***a. Investigations***

Currently, attempts to combat manipulation of sport in Finland are a cooperative endeavor between the police, sports community, betting company, and judicial authorities. 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 one of the key organizations that can connect players and law enforcement.

Finland have experience in investigating sport manipulations internationally, most notably through the most well-known multi country Joint Investigation operation coordinated by EUROPOL, namely, Operation JIT VETO. This operation, also called the Bochum Case, ran between July 2011 and January 2013 involving Europol and police units that uncovered extensive criminal networks in widespread sport manipulation. The investigation revealed 425 match officials, club officials, players, and serious criminals, from more than 15 countries, are suspected of being involved in attempts to fix more than 380 professional football matches. Finland was a central member of the Joint Investigation Team (JIT), and led the operation along with Europol, Germany, Hungary, Austria, and Slovenia.

### 4.4 Georgia

#### ***a. Investigations***

The process of investigations typically is initiated when sports organizations receive information, or in some important cases when the National Platform, official in national law, receives information, regarding suspicious betting activities from betting-monitoring companies. Disciplinary committees monitor sports events and examine suspicious cases. When there is suspicion of activity by organized crime, information is sent to the law enforcement bodies. Law enforcement agencies collect operative information regarding suspicious persons or activities. The use of undercover operatives has also been effective in Georgia. A surprising number of cases described below were discovered only

The operation was also supported by Eurojust, Interpol and investigators from eight other European countries.

#### ***b. Legislative Development and Current Policy***

The Criminal Code of Finland (39/1889, amendments up to 766/2015 included). The current policies against manipulation of sports competitions began in 2011, but there is still no specific legislation dealing with manipulation of sport competitions. Finland claimed their Criminal Code in its current format is sufficient to deal with sport manipulation. Finland regards the current situation of sport manipulation as very calm. Recently, however, there is a growing convergence of opinion that specific legislation on sports manipulation is necessary to tackle the problem. Ineffective sanctioning and lack of laws regulating specific aspects of corruption increases the possibility of those engaged in corruption continuing their corrupt acts. Penalties and sanctions, by the sporting authorities and the legislative bodies, are relatively weak. Finland does show political willingness to ratify the Macolin Convention, but it will depend on the European unity in the decision-making processes. See Annex for legislative details.

through the efforts of an undercover agent who provided key testimony.

#### ***b. Legislative Development and Current Policy***

On behalf of Georgia, the Ministry has signed all Council of Europe sports conventions, including the Council of Europe Convention on Manipulation of Sport Competitions (2014). The obligations under the given Convention are aimed at improving the situation at the national level in the signatory countries and reducing the incidents of corruption in sport. To share international experience and learn from others, the representatives of the Ministry of Culture, Sport and Youth of Georgia have been involved in projects of the Council of Europe since 2016, including "Keep Crime

out of Sport-KCOOS"(co-funded by the EU), and KCOOS+". Georgia, like several other partners, are also part of the Advisory group of the Convention committee for National

## 4.5. Malta

### *a. Investigations*

The executive police Investigates and initiates criminal proceedings related to sport manipulation. Serves as the umbrella organization to all sports in terms of responsibility for discovering, investigating, and sanctioning incidents of event manipulation. There exists dedicated unit within the police to deal with sport manipulation cases specifically.

After a suspected case is reported and police are duly informed, which is required by national law, the police authorities have an obligation to investigate. The case becomes their responsibility, and they are aided by the Magisterial Inquiry who assumes the role of investigator and can appoint experts to assist him. This is called the Magisterial Inquest. The Police and Magistrate can use all powers that the law provides for any other serious crime such as arrest, search, seizure, and freezing of assets. One common barrier of investigation is that organized crime does not use any communication devices that they have discovered. Rather, they meet face-to-face to leave no electronic trace of their encounters.

However, sporting authorities do not possess, and therefore are not allowed, to

## 4.6. Sweden

### *a. Investigations*

Discovery of cases are reliant on monitoring the betting market. This information is shared with the Swedish Football Association (SvFF), and it is up to them to follow up with an investigation within the FA. If the investigation uncovers enough evidence, the Swedish FA hands the case over to the Swedish police.

Anders Thornberg leads the Swedish Police Authority. They have a specific unit targeting organized crime in sport. This authority works with the National Operations

Platforms, known as the Group of Copenhagen. See Annex for legislative details.

use such powers. Therefore, if any suspect manipulation is not taken on by police authorities, or if they disregard it, sport authorities have limited powers to thoroughly investigate the case. The Executive Police force becomes ultimately responsible in this context to investigate and initiate criminal proceedings related to event manipulation. The pressure to discover, investigate, and sanction incidents of sport manipulation ultimately falls on law enforcement.

### *b. Legislative Development and Current Policy*

Each sporting Federation and Association is responsible for enforcing their own statutes, practices and activities. All of these authorities are affiliated with the Maltese Olympic Committee and their activities and regulations must conform to the Olympic Charter's model rules. Each of these organizations also has its own integrity officer, whose role it is to report and liaise with other authorities like the judiciary and pass along information to the police on behalf of their respective organization. The officer may also take the role of a prosecutor in front of sporting tribunals. Further details on legislation can be found in the Annex.

Department, which acts as a central information hub while supervising and directing police activities nationally and internationally against organized crime. Most recently, they arrested five people involved in a tennis sport manipulation scandal. This Authority has powers that are important for tackling sport manipulation, such as: Proposing legislative change, interrogations, house searches, seizures, information from banks and gaming companies, wiretapping, etc. Additionally, the Police Authority releases all documents to the public when a suspect of a sport

manipulation incident is successfully prosecuted.

### ***b. Legislative Development and Current Policy***

On January 1, 2019, the new [Gambling Act](#) made sport manipulation a criminal offence with a maximum penalty of two years in jail. The law punishes gambling fraud related to manipulation in sports, whereby an individual or individuals arrange an

outcome or event in a match in order to gain monetary benefit. If considered severe, the sentence ranges from 6 months to 6 years imprisonment. There is also the legislation on bribery and severe bribery, with the same penalties as above. This legislation criminalizes offering, giving, demanding, and receiving undue benefit to influence matches.

## **5. Partner Countries: Background, Best Practices/policies and Integrisport Next impact**

While key findings from the desk research on each country are elaborated in much more detail in the Desk Research: for each country, there is a brief overview of the situation nationally in this Guide, followed by a description and explanation of the setup of the Police/relevant public authority who was a partner in the project, which aims to foster a better understanding of their challenges. By way of a good example for the reader, the Guide highlights the main actions taken at national level thanks to the Integrisport Next project activities.

- Operational Infrastructure
- Situational Background / National status tackling/investigating and prosecuting sport manipulation
- Integrisport Next awareness raising session
- Project Impacts

Thus, below are examples of actions undertaken by country partners to activate interest, understanding and make real change nationally, during and thanks to their active engagement in Integrisport Next and the contribution of CSCF experts and other country experts. The following section outlines a guide for other countries to potentially address their own issues of sport corruption, and sport manipulation more specifically.

- Risk Factors
- Law Enforcement Investigations
- Sanctions
- Legislative Changes
- Whistleblowing
- Cooperation and coordination
- Other relevant stakeholders

### **5.1 Cyprus**

#### **Integrisport Next Awareness-Raising Session (ARPS)**

CSCF, in coordination with the hosting country partner, the Cyprus Police, executed their ARPS in early 2022. The session was supported by the Ethics Committee, INTERPOL, Spanish General Judicial Police, the United Lotteries for Integrity in Sport (ULIS/ex-GLMS) and CSCF experts, as well as special participation from FIFPRO as the project's supporting partner.

The session included important contributions from footballers' perspectives on sport manipulation, with a lively discussion between various players with

experience in sport manipulation. Case studies were used to identify the specific roles and responsibilities of stakeholders in Cyprus. This session involved several national stakeholders as well as input from CSCF experts and welcomed 79 national participants.

#### **Project Impacts**

The Project worked to acknowledge the risk factors (see below) and raise awareness about their existence in the national context. Crucially, CSCF was able to assist the project partner, the Cyprus Police, with addressing some of these risk factors. The practical impacts that occurred as a result of this



project, in order to address the risk factors, are noted below:

In order to tackle sports manipulation, President Nicos Anastasiades announced a range of significant changes over the last two years to target corruption in general, and specifically pointed out sport corruption. Cyprus is creating a new Deputy Sports Ministry, an independent Sports Authority, an anti-corruption task force under the attorney general, a financial crimes investigation unit, and an integrity service to vet official's personal assets and conflicts of interest. This announcement included plans for improving whistle-blowing legal protections. The universal application of the Code of Conduct provided by the Cyprus Sports Organization will also now be enforced. In addition, sanctions have been increased in severity, and the public will be allowed to access anti-corruption investigations to improve transparency.

Chryso Angeli and Pantelakis Andreou, the primary representatives to the project from the Cyprus Police stated that the Project had a massive impact.

Notably, the police unit was reshuffled to create a sport manipulation-specific police unit. This unit works independently to investigate cases of sport manipulation. Furthermore, representatives of this unit have used the connections established during the Project to contact Maltese Police to work together for future cases and incidents of sport manipulation.

By acquiring knowledge from both IntegriSport and Integrisport Next, the registration of 5 cases before the Court was accomplished between 2019-2021. Two of them concern sport manipulation or attempted sport manipulation. Three concern betting by sports agents and athletes.

### **Operational Infrastructure – The Cyprus Police**

The Cyprus police operates under the Ministry of Justice. Criminalizing sport competition in 2017 manipulation resulted in improved competence towards dealing with sports manipulation. For example, they are a member of the Europol Analysis Project Sports Corruption, and they

cooperate with Cyprus Sports Organisation as well as the Cyprus FA in order to investigate incidents of sports manipulation. This stakeholder is currently helping to develop the National Platform and preparing for eventual ratification with the Macolin Convention.

The duties and responsibilities of the Police are set out in the amended Police Law (N.73(1)) of 2004 and include the maintenance of Law and Order, the prevention and detection of crime as well as arresting and bringing offenders to justice.

The Cyprus Police was established in 1960. Its basic duties include the maintenance of law and order, the prevention and detection of crime as well as arresting and bringing offenders to justice. However, in view of the enormous socio-economic changes that have been taking place it has gradually broadened its traditional role and is making continuous efforts to upgrade its services, to be able to fully meet the demands and expectations of a modern state.

The vision of Cyprus Police is to be a fully productive and effective organization that is citizen-oriented and focuses on the constant provision of quality services to the public. To fulfil its aims and objectives that derive from its vision, Cyprus Police has adopted a contemporary approach to policing which combines the basic premises and components of what is commonly referred to as Community Policing with features and aspects of Intelligence-led policing as well as 'Smart' Policing.'

The Cyprus Police has one Division for each district of Cyprus. Police stations are part of each division and, branches can be created like the branches of the Police Headquarters. Police Personnel are posted to the seven Departments which make up Police Headquarters, as well as seven Units and six Police Divisions. The Fire Service is also an integral part of the Police.

Police work is divided into four principal areas, each administered by an Assistant Chief of Police. These are: Administration, Operations, Training and Support Services. The Cyprus Police has competence in investigating match fixing related criminal cases – money laundering, corruption, bribery, fraud, criminal conspiracy and cybercrime and it is member of Europol

Analysis Project Sports Corruption. The Cyprus police regularly co-operates with other stakeholders in investigating sport manipulation cases, notably with the Cyprus Sports Organisation and the Football Association.

The competence of this partner has increased since the recent legislation in place in Cyprus, criminalising sport manipulation and preparing Cyprus for an eventual ratification, when permitted, of the Council of Europe Convention on the Manipulation of Sports Competitions. This experience in developing the national platform, national co-operation and developing and handling new specific legislation will be useful for other EU (European Union) member states, while allowing the partner to also receive valuable feedback and exchange. In addition, they will provide input to the research phase, including understanding the Cypriot situation and challenges faced regarding LEA and judiciary involvement in tackling sport manipulation.

### **Situational Background**

Following the economic crisis in 2012-2013, Cypriot sports were in a serious financial situation. This crisis exacerbated and magnified issues in Cyprus over the past decade, including sport manipulation, particularly football. Surveys in Cyprus showed that club officials are the most frequent instigators followed by other athletes and referees. Many of these clubs are controlled by individuals who are not subject to due diligence measures by the football federation. Allegations of institutional corruption have been made regularly for the last decade in Cyprus. In 2013, FIFPro put out a statement discouraging players from signing for Cypriot clubs because the teams so regularly failed to honor contracts and pay players on time. Just one year later, Federbet revealed that half the games that season showed signs of manipulation. Car bombings have been occurring with alarming regularity over the last two decades. Players expect sport manipulation to occur, with a survey in 2016 revealing that at least 80% of first division players are aware that sport manipulation exists in their league.

Cyprus has duly been labelled the central hub of European sport manipulation, which represents highly significant reputational damage to Cypriot sports. The types of manipulations are betting-related, less so non-betting sport-related, where the principal motivation is to make money or launder money. In the last few years there has been a sharp increase in cases, with basketball and volleyball incidents adding to the already highly prevalent football incidents. It is noteworthy that the manipulations entail threats to life and physical harm. The mechanisms for enforcing regulation systems and evaluating their effectiveness are still a concern.

Sport manipulation is unquestionably a reality for Cyprus and the challenge is compounded by the small size of the country meaning that anonymity is an evasive luxury. It is quite an entrenched situation, in the last few years there was a stark increase in sports manipulations. It was mentioned by participants that although the Police try to have a separate office to deal with sports manipulation, it remains difficult to investigate sport manipulation cases. In general, the key organizations needed, and their responsibilities are also not defined clearly, which exacerbates the issues. The Ethics Committee works closely with the police and is viewed as an important contributor to solving the problem.

### **Risk Factors**

The following are risk factors of match-fixing that exist in Cyprus and other countries

- a. Underpaid referees
- b. Underpaid players
- c. Financial fragility of clubs/teams
- d. End of season matches
- e. Salary delays for players, referees, club officials
- f. Omert /Fear of reporting incidents
- g. Less attention on competition (media and fans)
- h. Difficulty of separating gift-giving and bribery
- i. Failure to adequately protect player anonymity
- j. Foreign players in league
- k. Lack of betting restrictions for high-risk games (youth, amateur,

- lower division, and end of season matches)
- l. E-sports betting popularity and cryptocurrencies allowed in sport betting
- m. Small country

The perception of corruption in the Cypriot government and the subsequent unwillingness or inability to make change by Cypriot authorities makes Cyprus more vulnerable *inter alia* for sport manipulation. The confidence in authorities from the public and sport actors is low. Evidence of this comes from January 2020, when Omonia Nicosia chairman Stavros Papastavrou claimed that the league could be bought for the right price, stating he was approached to buy off matches and referees multiple times during his 18 months at the club. Players, club managers, and other sport actors similarly expect corruption. In fact, approximately 90% of the public consider corruption to be a major issue in Cyprus that is not properly dealt with. Secondly, the Cyprus football league, which is the main sport at risk for sport manipulation, is mired in financial difficulties. Players and referees are neither paid well nor on time, and commercial investment is low. Allegedly, sport manipulation became a way of boosting funds for the clubs and paying player's salaries. The example of 1 Euro contracts in Cyprus are a clear risk factor for players feeling desperate in terms of their financial situation. Clearly, in such situations the players do not have a proper contractual basis for their employment. It is common that they receive pay in the first month but none thereafter. Players are put in a position where they can accept cash in their pocket through submission to manipulation approaches in order to resolve their financial situation.

Thirdly, the structure of the Cypriot football league is problematic. Competitive balance in the league is almost nonexistent and oversight is minimal. The top clubs in the first division are separated categorically from the rest of the clubs in strength and size. Almost 70% of the income comes from those big five, which means that the "Big Five" has massive influence over the decision-making processes that happen in the league, such as the appointment of

referees. These clubs are in a position where they can hire referees to influence the results as they see fit. Given the financial pressure the clubs have been placed under after the recession, the incentive to do this is higher than normal. The reality that these clubs dominate the rest of the league also leads to indifference from the other clubs towards results. Oversight in Cyprus is so low in this regard that there are even allegations of fake referees coming from abroad to Cyprus to officiate rigged friendly matches.

Finally, fears of repercussion from reporting are a serious problem in Cyprus. Players and referees have been met with disdain, intimidation, and indifference when whistleblowing occurs, or even the suggestion of corruption arises. Even when cases are investigated successfully, testifying before court is a daunting prospect for the sport actors who are not confident in ability of the authorities to protect them and who fear repercussion from corrupt authorities. The lack of reporting and the culture of silence that results key threats in Cyprus for sports manipulation.

### **Whistleblowing**

The government is working on a common law on all sports-related issues. Some cases have been successfully brought to court, although none have been prosecuted. Discovery of cases is supported by monitoring of their betting market through a private company, as well as relying on anonymous reporting through the Red Button App for players. Alerts are sent to Cypriot sport authorities.

### **Relevant Stakeholders**

Currently coordination occurs between the police, Section for Combatting Intellectual Property and Illegal Gambling, the National Betting Authority, and the Cyprus Sport Ethics Committee.

### *Committee of Ethics and Safeguarding in Sport (CESS)*

Appointed Directly by Council of Ministers, the CESS functions as National Platform. It has authority to investigate unethical behavior of people in sports. They can interview persons who have information or are involved in a suspected incident, Can postpone events if there is reasonable suspicion that it has been manipulated, and they work closely with the police and

national betting authority, who are required to notify the Committee in case of suspicious events.

#### *Cyprus Football Association (CFA)*

Governing body of football in Cyprus. Punishments against sport manipulation include: Clubs implicated in betting are fined 50,000 euros and the punishments become harsher with every additional notification. Penalties of up to 10,000 euros and loss of CFA funding are another form of punishment for clubs convicted of sport manipulation.

#### *Cyprus Sports Organization (CSO)*

This federation is the representative of Cyprus of all Cypriot sports. The CSO is responsible for protecting the reputation, integrity and reliability of Cypriot sport

locally and internationally. Any violation of their code of conduct could result in referral to the Disciplinary Board. CSO also expressly forbids bribing and gift-giving, unless it is ceremonial.

#### *Ministry of Justice*

The Ministry of Justice is heavily involved in Cypriot sports given the numerous recent scandals of sport manipulation. The Justice Minister George Savvides has made statements bemoaning the current situation and is trying to make changes to combat corruption in sport. For example, all second division games will be recorded and monitored, every incident of sport manipulation will be investigated, and they have reiterated that the government will try to better protect whistle-blowers

## **5.2. Estonia**

### **Integrisport Next Awareness-Raising Session (ARPS)**

CSCF coordinated with the hosting country partner, the Estonian Police and Border Guard, to execute the ARPS September 28-29, 2021, which involved several national stakeholders as well as input from CSCF experts and welcomed 42 national participants. The session included valuable presentations on sport organization perspectives of sport manipulation and a detailed account of how it impacts players in the country. Policy was analysed and discussed as it relates to addressing the issue.

The ARPS allowed for coordination across partner countries to occur. An Estonian case was discussed, and FINCIS contributed importantly in the event to share an example of good practice from Finnish cases.

### **Operational Infrastructure – Estonian Police and Border Guard Board**

The main tasks of Police and Border Guard Board are the securing of the external border of the European Union; the determination of citizenship and issue of documents; security and public order in the state; and the investigation and prevention of offences.

These tasks are divided between four work areas: border guard, public order, criminal

police, and citizenship and migration. In its present structure, Police and Border Guard Board started its work on 1 January 2010 when Police Board, Central Criminal Police, Public Order Police, Border Guard Board, and Citizenship and Migration Board (CMB) were merged.

The main tasks of the Corruption Crimes Bureau are performing of surveillance activities and pre-trial investigation of corruption related crimes as stipulated in Penal Code.

### **Project Impacts**

The Project worked to acknowledge the risk factors (see below) and raise awareness about their existence in the national context. CSCF worked with the project partner, the Estonian Center for Sport Integrity, to address some of these risk factors in a practical manner during the project's lifetime and putting in place measures for long-term actions. The practical impacts that occurred as a result of this project, in order to address the risk factors, are noted below:

Thanks to the seminar conducted during the Project, all stakeholder parties met, awareness was increased, and further steps were taken. Remo Perli of the Estonian Police and Border Guard deemed that the Project was necessary to trigger cooperation

nationally and boost participation of international networks, on a variety of sport integrity issues.

Thanks to Integrisport Next, two surveys were created by the Ministry of Culture and conducted in cooperation with the Ministry of Culture, Police, Ministry of Justice, and Estonian Center for Integrity.

- Survey among athletes, coaches, referees about the awareness of sport manipulation
- Legal analysis of the possibilities of proceeding sport manipulation cases

These surveys found that police investigators believed that the current legal environment does not support the prosecution of sport manipulation and sport manipulation is not sufficiently criminalized.

The Ministry of Culture has agreed to make a proposal to the Ministry of Justice to change the Penal Code.

### **Situational Background**

Most of the participants from different stakeholders in Estonia believe the country is a safe place for sport. However, there were some participants that believed, at least at the start of the project, that Estonia has not been dealing with sport manipulation 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 league is not a wealthy one, which means players and referees are paid relatively poorly. This is especially true in football, which is the sport most at risk for sport manipulation. Some of the sports leagues are even semi-professional, which further heightens the risk of players complying with sport manipulation in order to support themselves as athletes. Like in other countries, the foreign players may not adhere to Estonian cultural norms and be further at risk for conspirators because they may not feel any sense of responsibility towards the Estonian community.

Football and tennis are the only sports mentioned in connection to sport manipulation in Estonia. The problem of

sport manipulation in Estonia is 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 manipulation is exceptionally low in the priorities of the Ministry of Justice, possibly because there is only one recorded major incident of sport manipulation in Estonia. This supports the information discovered in the Fact-Finding Mission in Estonia, which confirmed that preventing integrity problems is not a priority for sport organizations in Estonia.

The methods of discovering and investigating incidents is severely lacking. The question remains whether the current Estonian criminal law can handle this phenomenon because it is difficult to use in sport manipulation cases. The cooperation between stakeholders falls mostly under the responsibility of ESTCIS (Estonian Center for Integrity in Sports), and their efforts to centralize and coordinate are still an ongoing process.

### **Risk Factors**

The following are identified risk factors of match-fixing that exist in Estonia

1. Denial of the problem
2. Underpaid referees
3. Underpaid players
4. Financial fragility of clubs/teams
5. End of season matches (particularly those with inconsequential consequences for one or both teams)
6. Salary delays for players, referees, club officials
7. Omertà/Fear of reporting incidents
8. Less attention on competition (media and fans)
9. League play during summer months
10. Foreign players in the football leagues
11. Normalization of gift giving and bribery
12. Normalization of corruption in society
13. Lack of betting restrictions for high-risk games (youth, amateur, lower division, and end of season matches)
14. E-sports betting popularity
15. Cryptocurrencies allowed in sport betting
16. Small country
17. Legislative weakness
18. Cultural popularity of betting



The perception that corruption does not exist is a clear risk factor for sport manipulation. Many of the other risk factors in Estonia are similar to other European countries. The league is not a wealthy one, which means players and referees are paid relatively poorly. This is especially true in football, which is the sport most at risk for sport manipulation. Some of the sports leagues are even semi-professional, which further heightens the risk of players complying with sport manipulation in order to support themselves as athletes. Like in other countries, the foreign players may not adhere to Estonian cultural norms and be further at risk for conspirators because they may not feel any sense of responsibility towards the Estonian community. The country is one of the smaller ones in Europe and a consequence is that webs of relations exist across the sporting world. This familiarity can lead to problems such as blackmailing athletes with personal problems in order to manipulate competitions. According to representatives of Estonian sports-related organizations, there is also a lack of personnel in many sport organizations who are qualified enough to deal with sport manipulation. These representatives stated that some organizations may not have a single person within the organization knowledgeable on the phenomenon of sport manipulation.

While regulatory change has been happening in Estonia in regard to corruption, sport specific corruption is not a priority in Estonia. There is a lack of knowledge and acceptance of the problem that manifests in a variety of ways. This could explain the serious problems with Estonia's regulative legislation, as well as their current difficulties with discovering and investigating cases. Representatives of Estonia criticized law enforcement because of their emphasis on short-term outcomes. In order to boost performance goals, their focus is on individual cases and not the systemic network of activity that leads to such corruption. This is a common trend in tackling sport manipulation and one of the many reasons why incidents are not reported or not investigated. This supports the information discovered in the Fact-Finding Mission (FFM) in Estonia (2021), which confirmed that preventing integrity

problems is not a priority for sport organizations in Estonia. Education and awareness are needed to address many of these problems.

### **Whistleblowing**

Adoption and implementation of whistleblower protection was added to the domestic law at the end of 2021, obligated by an EU directive. However, only a few organizations in Estonia have created mechanisms that can make whistleblowing realistic. The responsibility for this lies with ESTCIS to deal with, who currently have links to a whistle-blowing hotline on their website.

### **Relevant Stakeholders**

#### *Ministry of Justice*

The new Anti-Corruption Action Plan (2021-2025) focuses on short term activities that will contribute to achieving the long-term objectives. It also sets out to comply with the relevant international agreements, improve national legal regulations and promote cooperation both within the country and between countries for sport integrity issues including sports manipulation

Each relevant agency, as part of the anti-corruption network in Estonia, is responsible for elements of the action plan and will appoint representatives to that end. The network will share best practices, support coordination and cooperation, and exchange experiences. The activities of the interest groups, such as the national contact point for sport manipulation, will be supported through this Action Plan

According to Integrisport Next's Fact-Finding Mission in 2021, which took place prior to the awareness-raising session, there is a perception among Estonian representatives of sports-related organizations that the Estonian authorities and sport-related organizations are working separately on the issue of sport manipulation. Evidence of this is the fact that there is no unified regulation for sport manipulation that covers all sport federations.

A few key changes relevant to sport manipulation as part of the Action Plan include:

- *Protection of whistle-blowers.* Adoption and implementation into domestic law by the end of 2021, obligated by an EU directive. Only a few organizations in Estonia created mechanisms, thus the overall reporting of corruption is not regulated in Estonia.
- *Investigation of corruption offences.* Strengthening of investigations of corruption. Currently the Prosecutor's office lacks sufficient tools and expertise to investigate related corruption and financial crimes adequately.
- *Sectoral transparency.* There is to be an increased focus on transparency in certain sectors, including sport. This Action Plan addresses a shortcoming or failure until now to address the danger of sport corruption. The sports policy until 2030 determined that sport is an important economic sector and an area that needs to be a priority for development. As a result, preserving the integrity of sport competitions is a priority for the Government of the Republic.
- *Awareness.* All stakeholders will be made more aware of sports manipulation. The efforts towards all stakeholders (children, young players, athletes, coaches, members of governing bodies, sports officials, sport organizations at amateur and professional levels) will be raised. Thus, for example, Estonia is part of the Integrisport 3.0 project (2023-2024).

#### *Corruption Prevention Council (CPC)*

This department of the Estonian government analyzes sport-related issues, makes propositions for development, drafts relevant legislation, and supports principles of fair play in sport. Its objective is to prevent corruption after analyzing anti-corruption activities in Estonia.

#### *Estonian Center for Integrity in Sports (ESTCIS)*

Their training activities and education were expanded in 2019 to include topics related to sports competition manipulation. ESTCIS works to promote healthy and fair sports as an independent organization, a centralized agency for all sport integrity issues. It serves as the National Contact Point for sports manipulation cases. ESTCIS joined the Council of Europe's Macolin Convention Advisory Group for National Platforms (Group of Copenhagen) in 2020, and is being established as the coordinator for Estonia's National Platform.

The Action Plan 2021-2025 expresses a commitment to develop ESTCIS into a competent center countering sports corruption. Their betting monitoring covers almost 1,000 fixtures. Starting in the summer of 2022 this agreement covers ice hockey, badminton, beach football, indoor football, and cricket.

#### *Estonian Football Association (EJL)*

The contributions of the EJL towards the fight against sport manipulation remains difficult to evaluate. There is only one case of sport manipulation on record; the incident mentioned above from 2011. They did not discover the case, nor did they contribute considerably to the investigation. The sanctions in that case were minimal, even though it was clear sport manipulation was occurring. This may be of course due to lack of resources, sufficient sport regulation/national legislation and-at the time especially- due to minimal inter-stakeholder co-operation.

However, this is the only federation that has a well-established Disciplinary Committee. The EJL is the only association that has relevant rules, regulations, investigation capacities, and education programs specifically directed sport manipulation. The other sport federations lack this capacity so far.

## 5.3. Finland

### Integrisport Next Awareness-Raising Session (ARPS)

CSCF, in coordination with the hosting country partner, the Finnish Center for Integrity in Sports (FINCIS), executed a very successful local event on November 2-4, 2021. This session involved several national stakeholders as well as input from CSCF experts and welcomed 45 national participants. The ARPS allowed for coordination across partner countries to occur. Cases were discussed in detail and experts contributed importantly in the event.

The session included valuable presentations on sport organization perspectives of sport manipulation and a detailed account of how it impacts players in the country. Policy was analysed and discussed as it relates to addressing the issue.

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.

### Project Impacts

The Project worked to acknowledge the risk factors (see below) and raise awareness about their existence in the national context. With CSCF's support, Project partner FINCIS, worked during the project to address some of these risk factors. The practical impacts that occurred as a result of this project, in order to address the risk factors, are noted below:

- The Integrisport Project led to the organization of two successful training sessions for the Finnish Police and prosecution service. This occurred due to the impact of the project activities.
- Jouko Ikonen, from the Finnish Center for Integrity in Sports stated that the Project has been an excellent way for networking among authorities, in particular cooperation was established between national

police officers and prosecutors. A network within various police departments now exists, which results in the police being better educated, prepared, and professional for the challenges of sport manipulation.

A concrete example of an impact thanks to Integrisport Next: The National Police Board was informed in 2022 that the Police University College is now considering adding the course of Sports Integrity to the curriculum. This would result in a permanent study of this topic in Finland for future police forces.

### Operational Infrastructure - FINCIS

FINCIS is a non-profit organisation that deals with ethics in sport in Finland and collaborates with international organisations. In the future, FINCIS's agenda may include other ethics-related matters as well—in addition to the above-mentioned prevention of sport manipulation, antidoping activities and spectator violence. The organisation receives its funding from the Finnish Ministry of Education and Culture, as well as other partners. The members of FINCIS are the Finnish Paralympic Committee, the Finnish Society of Sports Medicine, and the State of Finland, represented by the Ministry of Education and Culture.

<https://suek.fi/kilpailumanipulaatio/>.

FINCIS was established in 2016 and exists within the Ministry of Education and culture. FINCIS advocates for ethical principles in Finnish sport, their main objective being to promote fair play, ethics in sport, doping control, combat sports competition manipulation, and comply with international conventions related to sport ethics issues.

- They are the main body responsible for preventing sport manipulation. They act as a centralized body that coordinates policies between different administrative branches and sports bodies against sport manipulation, including the National Platform.

According to their website <https://suek.fi/kilpailumanipulaatio/>, FINCIS are tasked to:

- Specify responsibilities of different actors in national efforts to eradicate manipulation of sports competitions;
- Develop the joint activities of the public authorities and the sports movement in matters related to ethical questions related ethical issues;
- Keep track of international cooperative efforts towards the resolution of sport-related ethical problems;
- Make recommendations on sport-related ethical issues to parties affected by them at any given time;
- Serve as a national body for cooperation and coordination between sporting associations, public authorities and the gaming sector in matters regarding prevention of the rigging of sporting competitions;
- Act in accordance with the Convention on the Manipulation of Sports Competitions as a national action group;
- Run a working division, serving as national action group in accordance with Convention on Manipulation of Sports Competitions.

FINCIS recommends that each sport federation develop their own internal guidelines for cases of sport manipulation, operating on a case-by-case model following a four-step process:

- Information about the case comes to the attention of the federation;
- Preliminary handling of the case within the union and decision on further action. If necessary, participants may be asked for responses or consulted with FINCIS;
- If the matter cannot be resolved by the union's own actions, the case will be reported to FINCIS or the police authorities;
- Police will decide on possible criminal investigative measures and disciplinary sanctions for the species.

FINCIS, sets out guidelines for athletes and sport actors when approached about sport manipulation:

- Identify or detect an attempted competition manipulation attempt. Refuse politely but resolutely;
- Report the proposal or possible violation either to the federation, players' association, SUEK or directly to the police. The key is to provide information to a trusted party and not be left alone. One can also report information anonymously via SUEK's ILMO service, or if their sport has other reporting channels, they can use those;
- Keep any information you receive, such as text messages or emails sent to you. They can later be used to investigate the case or as possible evidence.

FINCIS is responsible for the practical implementation of the Council of Europe's Anti-Doping Convention, the UNESCO International Convention Against Doping in Sport, the Council of Europe's Convention on Spectator Violence, and the Council of Europe's Convention on the Manipulation of Sports Competitions. The establishment of FINCIS is a continuation of the activities of the advisory board on ethical issues in sports appointed by the Minister of Education and Culture, Sanni Grahn-Laasonen, on 18 November 2015.

FINCIS will sharpen the focus on ethical issues in sport and emphasise the responsibility of all members of the Finnish sport family for ensuring fair play.

FINCIS is the Finnish member of the Group of Copenhagen - the Advisory Group of National Platforms of the Council of Europe's Committee of the Macolin Convention .

### **Situational Background**

Given the small number of exposed and discovered cases in Finland, sport manipulation is quite rare, at least where reported cases are concerned. The current situation of sport manipulation in Finland is claimed to be 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 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.

### **Risk Factors**

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 manipulation in Finland is minimal.

The following are identified risk factors of match-fixing that exist in Finland

- a. Denial of the problem
- b. Underpaid referees
- c. Underpaid players
- d. Financial fragility of clubs/teams
- e. End of season matches (particularly those with inconsequential consequences for one or both teams)
- f. Salary delays for players, referees, club officials
- g. Omert /Fear of reporting incidents
- h. Less attention on competition (media and fans)
- i. League play during summer months
- j. Normalization of gift giving and bribery
- k. Lack of betting restrictions for high-risk games (youth, amateur, lower division, and end of season matches)
- l. E-sports betting popularity and cryptocurrencies allowed in sport betting
- m. Small country
- n. Legislative weakness
- o. Cultural popularity of betting

The poor financial situation of Finnish football clubs is a risk factor. Players have lower salaries compared to the more lucrative European leagues: The average salary for a first division player in the SPL as of 2021 is approximately 40,000 Euros per year. While this figure might not be low in a Finnish context, it is a low figure compared to football players in major European leagues. Their contracts are also typically short and fixed-term. If Finnish players feel underpaid and are uncertain of their

financial future, they will be more susceptible to agree to manipulate a match. Risk of getting caught becomes outweighed by financial rewards of doing so, especially if the manipulation does not impact the overall outcome of the game. In addition, the poor financial situation of the league results in less media coverage of Finnish sports and lower numbers of public attendance compared to the rest of Europe. As a result, it is easier to perform badly on purpose while remaining unnoticed. This is especially true in lower divisions. The risk that someone would draw conclusions of suspicious performance from a newspaper article or video recording is low.

The time of year in which the Finnish football league is played is also a risk factor. Between April and October, while leagues like those in Brazil and the USA, among others are starting or ongoing, most football leagues, especially in Europe, are towards their end or are on a break, so this allows betting even during the "off" months of rest of the football world. During this period, therefore, limits are generally higher and there is a wide live betting coverage available.

The overall risk and cost of participating/organizing sport manipulation in Finland is minimal. Penalties and sanctions, by the sporting authorities and the legislative bodies, are rather low. This occurred in the infamous Perumal scandal: Players only received fines and probation in district court, and their prison sentences were decreased on appeal. Some of these convicted players were even able to return to competitive football.

### **Whistleblowing**

Anonymous reporting is facilitated through Finland's National Olympic Committee. Athletes can use the IOC Integrity and Compliance hotline; however, FINCIS serves as the primary reporting system for incidents of sport manipulation (FFM Finland, 2021). The Finnish Player Organization was also responsible for creating the Red Button App in partnership with local government. This Application is considered to be the best tool at present for anonymous reporting of sport manipulation. The F d ration Internationale des Associations de Footballeurs Professionnels



(FIFPRO) and the Fédération Internationale de Football Association (FIFA) endorsed the software in 2020. FIFPRO will distribute the Red Button App to players through affiliated associations, and it will work in conjunction with FIFA Integrity App, compliance software BKMS and other monitoring means. This App allows players to report anonymously without fear of putting themselves, their families, or their career in jeopardy.

In Finland, whistleblowers are protected by law only in limited cases under the Witness Protection Act 2015. This is not sufficient for all cases of whistleblowing, including reporting for sport manipulations.

### Relevant Stakeholders

#### *Finnish Olympic Committee (FOC)*

The FOC acts to prevent sport manipulation. Almost all national sports federations are members of the FOC, which serves as the umbrella organization for sports in Finland. Their action is in concert with the International Olympic Committee (IOC).

- The NOC assists all sport organizations in the country to comply with the Code. The Code refers to the Olympic Movement Code on the Prevention of the Manipulation of Competitions established by the IOC.

#### *Football Association for Finland (FFA): Suomen Palloliitto (SPL)*

The FFA approved a new Player Contract in 2019 prepared in cooperation with Veikkausliiga and Football Players Association. This Contract is mandatory in the top three categories of men's football and top two categories of women's football.

- Penalties may be imposed (a) for any infringement of the rules, regulations or decisions in force in the Union or in its territory under the rules of the Union;
- who attempts to play, plays or suggests gambling with a view to a pre-agreed outcome or otherwise manipulates or seeks to manipulate match events or fails to notify the association or club of such activities.
- If a person has reason to suspect a violation of this paragraph, the

Disciplinary Committee may impose a temporary ban on gambling and stewards. Before a decision is made on a temporary ban on gambling or staging, the suspect must be given the opportunity to be heard.

#### *Finnish Sports Arbitration Board (FSAB)*

The FSAB was founded in 1991 by Finland's sports governing bodies as an independent appellate body for sports-related decisions and disciplinary sanctions. The Board works as a disciplinary committee. Most of the activities of the Board are in respect to appeals for decisions made by the Finnish Anti-doping Agency (FINADA), as well as – but not limited to – contract disputes, appeals of athletes not selected for championships, and discrimination.

The FSAB is not competent to handle matters decided by or pending in civil court or arbitration. If a matter pending consideration by the FSAB is brought to civil court before it reaches them, then the case automatically lapses at the FSAB. In addition, enforcing decisions remains a challenge because the FSAB, following standard Alternative Dispute Resolution processes, is not nominated by state or based on legislation. Sports federations and clubs are merely bound by their own by-laws by membership rules, as such the Arbitration Board decisions merely make recommendations. The association or club may decide not to adhere to the decision of the FSAB.

#### *National Platform*

Finland's national platform is managed by the Ministry of Sports and is a public entity. A coordinator was placed within the independent legal entity, FINCIS.

- The Chairman and Secretariat of the National Platform are from FINCIS, and its members are the Ministry of Education and Culture, the National Board of Police, the Central Criminal Police, the Public Prosecutor's Office, Finnish Olympic Committee, Finnish FA, Veikkaus, and Player's Union.

#### Priorities / functions of the NP

- Exchanging information;
- Developing a general picture of the phenomena;

- Developing monitoring and risk analyzing;
- Developing closer cooperation with stakeholders in order to
- implement the art 13 of the Convention;
- Making initiatives for law amendments;
- Operational procedures
- Platform meets approx. 6 times/year and prepares issues between meetings in smaller ad hoc groups.
- Members of the platform take part to international co-operation. Platform organizes seminars, workshops etc.

*Ministry of Education and Culture*

## **5.4. Georgia**

### **Integrisport Next Awareness-Raising Session (ARPS)**

CSCF organized the event in coordination with the Ministry of Culture, Sport, and Youth of Georgia June 29-30, 2022. This session involved several national stakeholders as well as input from CSCF experts and welcomed 46 national participants. The ARPS allowed for coordination across partner countries to occur. Cases were discussed in detail and experts contributed importantly in the event.

The session included valuable presentations on sport organization perspectives of sport manipulation and a detailed account of how it impacts players in the country. Policy was analysed and discussed as it relates to addressing the issue.

### **Project Impacts**

The Project worked to acknowledge the risk factors (see below) and raise awareness about their existence in the national context. Crucially, CSCF was able to assist the Ministry as the project partner, with addressing some of these risk factors. Several positive impacts occurred as a result of this project, in order to address the risk factors - the IntegriSport Next project was one of the first opportunities that allowed stakeholders to establish practical results that could address sport manipulation. Teona Asatiani (Sport and Youth Affairs

Responsible for the overall management, coordination and development of the national sports policy, and for the creation of favorable conditions for engaging in physical activity. Responsibility for local administrative duties rests with the Regional State Administrative Agencies. In 2020, the Ministry established an Advisory Board on Ethical Issues in Sport, tasked with coordinating the different branches of government with sport bodies. This Advisory Board is similarly tasked with implementing international agreements concerning ethics of sport in Finland. In their view, the Finnish Penal Code on fraud can be strengthened through the addition of sports fraud as a criminal offence.

Department/Ministry of Culture, Sport and Youth of Georgia) acknowledged that the results were even more useful than previously anticipated, with high interest and participation throughout from the Georgian stakeholders. The usually passive interest was piqued thanks to the project activities, with cooperation and awareness raised on the relevant issues. Authorities were now more flexible and better prepared to deal with the relevant issues.

### **Operational Infrastructure – Ministry of Culture, Sport and Youth of Georgia**

The Ministry of Culture, Sport and Youth of Georgia has established the "Inter-Agency Committee of Sport Integrity which also includes the measures foreseen by the obligations taken by Georgia under the relevant Conventions of the Council of Europe" as well as thematic working groups under the given Commission, including the one fighting against manipulations during sports competitions.

Thanks to the Ministry-established "Inter-Agency Committee of Sport Integrity, the Ministry has a strong connection with Georgian law enforcement and security agencies, and with the Prosecution Service. As these organizations have little, or no, experience or prior education in fighting sport manipulation and cooperating internationally, the coordinator of the

Georgian National Platform holds an extremely key role. It must coordinate the interaction between the Georgian organizations and the Project and be instrumental in the implementation of *Integrisport Next*.

### **Situational Background**

In exchanges with local stakeholders during the project's various phases, 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 that it remains a significant challenge. Only a few manipulation cases go beyond the disciplinary committee (if there is any disciplinary committee for the sport in question), 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.

Georgia, despite its small population, is actively involved in high achievement sports and has meaningful results. The sports society involved in the project agreed that manipulation of sports competitions is a growing problem at international level. Sport manipulation, along with doping, hooliganism and racism is one of the most severe problems facing sport in the 21st century.

Thanks to the overall positive response by the Georgian society to fighting the threat of sport manipulation, Georgian authorities reported an increased active cooperate to fight against crime and corruption in sport. Eliminating corruption in the field of sports is one of the prominent issues that the Ministry of Culture, Sport and Youth of Georgia is focusing on and through inter-agency cooperation the Ministry is working to eliminate the given disadvantages of the sport. To this end, the Ministry actively cooperates both at national inter-agency and international levels. This is confirmed by Georgia's cooperation with the Council of Europe and its sub-committees.

### **Risk Factors**

- a. Denial of the problem
- b. Underpaid referees
- c. Underpaid players
- d. Financial fragility of clubs/teams
- e. End of season matches (particularly those with inconsequential consequences for one or both teams)
- f. Salary delays for players, referees, club officials
- g. Omerté/Fear of reporting incidents
- h. Less attention on competition (media and fans)
- i. Lack of betting restrictions for high-risk games (youth, amateur, lower division, and end of season matches)
- j. E-sports betting popularity and cryptocurrencies allowed in sport betting
- k. Small country
- l. Legislative weakness

Rule evasion in general, was, and arguably still is, a characterization of Georgian society, a way of life that remains difficult to change. Players, coaches and other sport actors grow up in a society where rule evasion is normalized. One Georgian Football Federation (GGF) official reported that manipulation was so common in Georgia that players could be seen openly arguing on the field about which of them was supposed to score a goal. Even if the remark was made "tongue in cheek", it reveals an underlying disposition.

Georgia has attempted to take steps to combat the recent cases of sport manipulation. For example, it signed the Macolin Convention in September 2014, even though the country has yet to ratify it. The general state of sport administration, particularly football which appears to be the most at risk for fixing in Georgia, is still weak. The cases of sports manipulation that occurred in the last decade have further damaged an already stricken football culture. As the country went through the political difficulties of the 1990s, sport was never a top priority and the state of football has never recovered. There has been no commercial interest in Georgian football for the last few decades because companies view football as a poor investment. Georgian football is thus characterized by lower-level leagues, very few fans normally in attendance, and substandard facilities.

Referees, arguably the most common target for fixers, are poorly paid as a result of the financial struggles of the domestic league. Referees in the second division of Georgia make approximately 60 USD a game, and players in Georgia are paid similarly low wages with reports of payments being irregular in the league.

The cases outlined below on the topic of competitive sport manipulation in Georgian football are unsurprising given these risk factors. The state of sport manipulation was so problematic in the 2010's that it is believed that games in the second division could be bought (i.e. manipulated) for as low as 5,000 euros. In 2017, a report by FederBet in Brussels (who monitor betting for fraudulent activity) stated that Georgian football is at high-risk for betting-related sport manipulation. They explained that few bookmakers offer odds for Georgian sport events, and when the bookmakers do offer odds, suspicious betting movements occur. The General Secretary of FederBet at the time mentioned that Georgia is near the bottom of the league for sport manipulation safety.

As such, football in Georgia exists amidst a culture accustomed to, and possibly even expecting, corruption at the highest level. The targets for fixing are individuals who grew up in this culture where evading rules is normalized, and they play in a league that is in a state of disarray with poor financial standards and low commercial viability.

### **Whistleblowing**

There is no whistle-blowing system set up in Georgia. <https://mkhileba.gov.ge/> is the government website for whistleblowing regulations for general corruption. There is no central whistle-blowing system set up through the GFF or the National Platform, or any other sports organization. In 2017, the Institute for Development of Freedom of Information (IDFI) Recommendation for Georgia stated specifically that Georgia should implement whistle-blower protections. The IDFI are the leaders in supporting the implementation of the Open Governance in Inter-Agency Coordination Council.

### **Relevant Stakeholders**

Georgia has significantly strengthened the cooperation in fighting against corruption over the past decade. The government has carried out several high-profile anti-corruption campaigns in different fields and recognizes that the fight against corruption cannot be a one-time reform or a time-limited process. Therefore, by Government Decree, the Ministry of Justice of Georgia established the Anti-Corruption Council and the Ministry of Culture, Sport, and Youth of Georgia is a part of this Council.

There is no particular sport organization responsible for fighting against manipulations across all sports. The most well-prepared federation is the Football Federation, which follows UEFA regulations. The other federations lack disciplinary committees and written procedures on how to examine cases and subsequently sanction them.

#### *Georgian Football Federation (GFF)*

The GFF has an integrity department in its governance structure, namely the Integrity Protection Service. The IPS monitors competitions in Georgia, and appears to be the most prepared federation, as well as being compliant with the European federation's - UEFA - regulations. The Division of Sport Fairness Unit within the GFF was launched in 2015 in response to repeated incidents of match manipulation. This Unit has the authority to make disciplinary rulings on incidents without involving law enforcement agencies, except in cases involving a violation of the Criminal Code of Georgia.

#### *Ministry of Internal Affairs*

The Anti-Corruption Agency of the State Security Service of Georgia (SSS) is not independent. Transparency International in 2014 raised the issue that it should be independent in order to address shortcomings of existing system in fight against corruption.

Despite this alleged lack of transparency, their operative, Giorgi Ghelaghtashvili, is responsible for uncovering many of the sport manipulation incidents in the country by going undercover. He has provided key

testimony in court proceedings for recent cases.

#### *Ministry of Culture, Sport, and Youth of Georgia*

The Ministry of Culture, Sport, and Youth of Georgia is viewed by sports federations as the mediating organization for sports manipulation. It works as a cooperative body between the different stakeholders. The Sport's State Policy from 2014-2020, ([http://msy.gov.ge/files/categoris/State\\_Sport\\_policy\\_of\\_Georgia\\_ENG.pdf](http://msy.gov.ge/files/categoris/State_Sport_policy_of_Georgia_ENG.pdf)), outlines the infrastructure of Georgian sport, sport education and science, and legislative authorities. The Deputy of this Ministry chairs the National Platform

#### *National Platform (Sports Integrity Authority)*

The Georgian National Platform was established by law in 2015. The official name of the national platform is the Interagency Commission for the Protection of Sports Integrity. The platform brings together all the responsible government agencies including the Committee of Sports of the Parliament of Georgia, the National Olympic Committee, and other sports organizations. When information is received by one of these agencies concerning the incidents of sports manipulation, that case is then discussed by the thematic group and transmitted accordingly.

The first Deputy Minister of Culture, Sport and Youth of Georgia chairs the Platform. The Deputy ministers' staff the Commission. Relevant thematic groups work in each field (manipulations of sports competitions, safety of sports competitions, doping) at the level

of experts. The Commission mostly works on policy-making and legislative issues.

In 2009, the European Union established formal cooperation, known as the Eastern Partnership, with six Eastern European countries - Azerbaijan, Georgia, Armenia, Belarus, Moldova, Ukraine. Its goal was to set up National Platforms in the member countries with guidelines for democracy, good governance, stability, contact of information, and other goals between 6 eastern European countries. This platform works with the European Parliament and the European Council (both EU entities).

#### *Anti-Corruption Coordinating Council (ACC)*

The ACC coordinates anti-corruption activities, elaborates and revises the anti-corruption strategy and action plan. It also supervises their implementation and can prepare amendments for anti-corruption legal documents. The Minister of Justice of Georgia chairs the Council. It is composed of senior government officials, international organizations, and national/international NGOs. Representatives of different governmental and non-governmental agencies are represented in the Council.

#### *Transparency International Georgia (TI)*

The goal of TI is to strengthen anti-corruption policy, integrity, and emphasize reform in the government. TI produces assessment reports of the Anti-Corruption Council in Georgia. It produces similar reports and research on corruption in Georgia, as well as evaluations of laws and policies.

## **5.5. Malta**

### **Integrisport Next Awareness-Raising Session (ARPS)**

The session in Malta was organised in April 26-27, 2022 by CSCF, in coordination with the hosting country partner, the Malta Police Force. This session involved several national stakeholders as well as input from CSCF experts and welcomed 54 national participants. The ARPS allowed for coordination across partner countries to occur. Cases were discussed in detail and experts contributed importantly in the event.

The session included valuable presentations on sport organization perspectives of sport manipulation and a detailed account of how it impacts players in the country. Policy was analysed and discussed as it relates to addressing the issue.

### **Project Impacts**

The Project worked to acknowledge the risk factors (see below) and raise awareness about their existence in the national context. Crucially, CSCF was able to assist the country partner, namely the Malta Police



Force, with addressing some of these risk factors. The practical impacts that occurred as a result of this project, in order to address the risk factors, are noted below:

- The discussions that occurred during the ARPS focused on establishing a new integrity body to coordinate efforts against sport manipulation. Thanks to the Integrisport Next Project, all main actors working directly or indirectly in sports were given the opportunity for the first time to be brought together in one place and share their views. Cooperation and coordination were improved, and Brandon Agius and Wayne Rodney Borg of the Malta Police Force also noted that Cyprus Police had invited Malta Police in preparation for the upcoming Project, highlighting the widespread impact and reputation of the project. These representatives of the Malta Police Force also stressed that they hope to continue to participate in future similar projects.
- Sports Authority Committees are now more aware of the Maltese Legislation Chapter 593. A small number of Sports committees have even sought the Malta Police Force's (MPF) guidance in providing lectures to their athletes on preventing Sports Manipulation.

### **Operational Infrastructure – The Malta Police**

The Malta Police has a mixed responsibility in respect of its investigative role and national security. In the investigative role, the Malta police is legally bound to act upon the receipt of any information, report, or complaint, and decide the respective natures of such information to treat accordingly. The police is always in search of the truth within the parameters of its investigative powers, combined with those afforded by the judicial authority.

The role of a police officer is multifaceted. It includes the preservation of public order and peace; the prevention, detection, and

investigation of offences; and the collection of evidence against offenders.

The Force operates the following specialised branches:

- Administrative Law Enforcement Unit
- Criminal Investigation Department
- Drug Squad
- Economic Crime Unit
- Protective Services
- Rapid Intervention Unit
- Special Branch
- Special Intervention Unit
- Vice Squad

One part of the Economic Crime Unit within the Malta Police Force specifically tackles sports related crimes such as sports manipulation and corruption.

### **Situational Background**

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, while increased proactivity remains a challenge for the future.

### **Risk Factors**

The following are identified risk factors of match-fixing that exist in Malta, thanks to the research and fact-finding missions during Integrisport Next:

- a. Denial of the problem
- b. Underpaid referees
- c. Underpaid players
- d. Financial fragility of clubs/teams

- e. End of season matches (particularly those with inconsequential consequences for one or both teams)
- f. Salary delays for players, referees, club officials
- g. Omertà/Fear of reporting incidents
- h. Less attention on competition (media and fans)
- i. League play during summer months
- j. Normalization of gift giving and bribery
- k. Lack of betting restrictions for high-risk games (youth, amateur, lower division, and end of season matches)
- l. E-sports betting popularity and cryptocurrencies allowed in sport betting
- m. Small country
- n. Legislative weakness
- o. Cultural popularity of betting

In almost all cases, corruption is precipitated by low accountability and lack of transparency. These are both evident in the cultural context of the sporting world and broader Maltese society. Former Malta Football Association Integrity Officer, Mr. Tabone, explained in his March 2014 Newsletter #28 that the lack of accountability manifests in Maltese football officials displaying a noncommittal attitude whereby they deny the problem, do little to address it, and expect other stakeholders to eliminate sport manipulation. In this same Newsletter #28, Tabone explicitly expressed disappointment that officials were not in attendance during education sessions of the time, that they were not truly interested in combatting the problem, and he questioned their overall commitment to the fight.

Additionally, the expectation that other stakeholders, such as police authorities, must do the majority of the work for investigations seems problematic. There have been accusations that sport corruption is not a top priority for the Maltese police force in the past, and it may still continue to be a low-level priority for Maltese police force.

FIFPro dropped Malta in 2012 from the pool of countries the 2012 Black Book Eastern Europe Survey. This survey was intended to investigate to what extent players were approached to manipulate their competition in addition to their overall awareness of

‘fixes’ carried out by others. Malta was dropped from this survey because there were so few responses from the players. Players reported that they feared the loss their employment, a possible punishment by clubs if statements were made publicly. They also feared violent reactions from fans or from criminals. Sport actors are not convinced about anonymity protections in such a small country, which makes them hesitant to report incidents to authorities.

The performance level of football is low compared to the rest of Europe and the general public displays very little interest in the sport. In the 1990's, a survey showed that a main reason for low attendance was the belief from the public that matches, including national team games, were manipulated in advance. This attitude remains the same today, and the lack of fan attendance and public scrutiny makes it even easier for games to be manipulated. This low level is also related to the poor financial state of the league. As a result of the lack of money, Maltese football clubs use proceeds from manipulation to finance their operations in addition to personal gain. This explains why club officials are more likely to comply and participate in corruption. The players are also not paid well and are frequently not paid on time.

There are several cases of sport manipulation in Malta, even though many tools are in place to combat sport manipulation at the international, European, and even local levels. However, difficulties remain in securing widescale reforms. The regulations in place matter little if the relevant Maltese authorities cannot identify or discover the incidents of sport manipulation as they occur. Additionally, even after cases are discovered, the over-reliance on the police for investigations seems problematic. Further, even when cases are investigated by the police, prosecution becomes difficult because evidence of sport manipulation is so difficult to obtain. Having the tools matters little if the individuals responsible do not commit to their roles. As such, problems still exist in Malta in relation to discovering the incidents themselves, investigating them, and prosecuting effectively in sport tribunals and the court of law. This is however arguably

not an issue that is unique to Malta but rather a wider trend.

### **Whistleblowing**

The 2018 Sport Act mandates that players must immediately report if approached. This 2018 Act now mandates that anyone aware of offences who fails to communicate would also be guilty of such offences. This is outlined in Chapter 593 of Laws of Malta which came into force on 31/07/2018. The duty to report as outlined in these laws in Article 5 is 14 days from the time of the incident itself. Failure to report is a reduced punishment, but nonetheless still punishable. The Act does, however, exempt those cases where a report provides information leading to a successful prosecution. Some stakeholders did report during the project sessions that this 14-day rule was sometimes short and restrictive, resulting in a counter-productive outcome.

The Red Button app was provided to Malta so that players could report anonymously. However, questions remain about the ability to protect player that anonymity. An additional problem is the Red Button App caters to players, and a successful reporting mechanism in Malta should cater to all sport actors who may be implicated in sport manipulation.

### **Relevant Stakeholders**

While the Malta Football Association has its own Integrity Unit/Officer, there is no national strategy or integrity authority in place yet that dictates discovering, investigating, sanctioning incidents of event manipulation. The implementation of such an authority is currently in process at the time of writing.

#### *Malta Football Association (MFA)*

The Anti-Corruption Task Force that was established in 2015 led to the introduction of the Prevention of Corruption in Sport Bill. This task force focuses on education, strengthening the legal framework against sport manipulation in football, and providing more resources for the police.

The integrity officer is responsible for educating relevant stakeholders. Former police inspector Dr. Herman Mula was appointed the MFA integrity officer in February 2020, taking over from Franz

Tabone who held the position since 2011. His appointment was intended to facilitate the creation of a dedicated Anti Match-Fixing Unit.

#### *Malta Football Players Association (MFPA)*

The MFPA protects the rights of players and promotes their best interests (by providing legal advice). Regulations and statutes can be found on the dedicated website (<https://www.mfa.com.mt/en/the-mfa/themfa/8/statute-and-regulations.htm>).

The MFPA launched and monitors the Red Button App, mentioned above as a reporting system for players.

#### *Ministry of Education*

The Ministry forms part of the Government of Malta. Equipped with the tools necessary to fight sport manipulation at state and association level and aims to work together across borders against sports manipulation, the Ministry organizes and implements the National Sport Corruption Strategy.

The Malta Sports Council ([Sport Malta](#)): Mission is to promote and develop sport for Malta.

- Implement government policy of sport and establish dispute resolution structures. Support work against sport manipulation cases and other integrity threats, and they function as cooperative body by putting partner organizations in touch with sports governing bodies

#### *National Platform (Sports Integrity Authority)*

The National Platform (AIMS) was established through the Sports Governance and Integrity Act 2021, and it is a separate regulatory body from SportMalta. Whereas SportMalta concerns itself with the provision of sport services by the government and regulatory services, AIMS focus exclusively on sport integrity matters. This integrity unit includes the police, Sports Malta, Malta Football Association, Malta Gambling Regulator, the Judiciary of the Government departments, and other ministries of sport. AIMS will bring stakeholders together to share information, raise awareness, and use educational campaigns to prevent sport manipulation as well as other issues of sport governance and integrity.

### *Court of Magistrates*

The Court of Magistrates is the working power of the criminal justice system in Malta with both civil and criminal jurisdiction. It takes on the role of investigator in sport corruption cases. According to the Criminal

## **5.6. Sweden**

### **Integrisport Next Awareness-Raising Session (ARPS)**

The session coordinated by CSCF and organised by local partner, the Swedish Sports Confederation, occurred on November 24-25, 2021. This session involved several national stakeholders as well as input from CSCF experts and welcomed 76 national participants. The session was successful in bringing together a variety of stakeholders in order to educate them on the findings of the research phase, specifically their unique situation as it relates to sport manipulation. The result of the session was that the stakeholders understood their roles clearer, learned how to better cooperate, and understood the problem at a more comprehensive level.

### **Project Impacts**

The Project worked to acknowledge the risk factors (see below) and raise awareness about their existence in the national context. CSCF was able to assist the project partner, the Swedish Sports Confederation, with addressing some of these risk factors. The practical impacts that occurred as a result of this project, in order to address the risk factors, are noted below.

The Integrisport Next Project led to the first ever meeting for awareness raising among both police and prosecutors, which awakened understanding of the international context of the problem. Stakeholders in Sweden are now more aware of the issue and cooperation is a priority, according to Jakob Uddeholt of the Swedish Sports Confederation.

The Project allowed stakeholders to understand each other from another point of view. As a result, the Project was an important reminder that athletes must be included in the discussion. Their protection will help address the situation. Many ideas

Code, a magisterial inquiry can be triggered to investigate suspected crimes, which carry prison sentences of three or more years. This investigation must be requested from the police or a private citizen – the Court may not investigate on its own account.

for continued awareness raising were introduced, such as how to tailor education sessions to specific contexts and how to put the education and ideas into the daily use.

### **Operational Infrastructure – Swedish Sports Confederation**

The Conference is a umbrella organization bringing together approximately 70 member sports federations. As the central organization for the sports movement in Sweden, the task of the Confederation is mainly to:

- Support the sporting development and knowledge development in all the sports federations.
- Represent the sports movement towards the authorities, politicians, and society at large.
- Distribute and follow up with the State's funding for the sports movement based on the Government's guidelines and in line with the sports movement's strategy and goals as a whole.

Regarding the work against manipulations in sports competitions, the Swedish Sports Confederation has a mission to support the sports movement to counteract the crime related to sports. As a central framework, there is an agreement between the Police Authority and the Swedish Sports Confederation with the common aim of making sport a safe environment for athletes, audiences, judges, and other functions. The agreement covers three main arenas in which the work against serious crime in sports occurs - match fixing is one. The other two are to ensure secure and welcoming sporting events and to engage in joint work against terrorism in connection with sporting events. The Confederation is responsible for representing Swedish sport in the matter of tackling sport manipulation, through coordination of and support to sport federations

The Confederation is responsible for the anti-match fixing regulation for sports. Working on strategic level with issues related to sports manipulations with other central stakeholders such as the Police, Prosecution authority, Gambling authority, the ministries of Culture and Finance.

It supports sports federation and sports associations with education and information, for example by developing the platform for education and information regarding match fixing: [www.minmatch.se](http://www.minmatch.se).

The Swedish Sports Confederation represents sports in the Swedish National Platform, namely the Match-fixing Council.

### Situational Background

There appears to be a good awareness and willingness to fight against sport manipulation, an issue which is considered a significant threat. The situation is steady, with increased media attention. In addition to the Swedish Sports Confederation, the most active stakeholders in the fight against sport manipulation from the sport domain come from football: The Football Association, and the Football League, although several other actors are increasingly concerned about the problem, such as the Swedish Lottery, Svenska Spel. Swedish authorities believe that their legislation and preventative efforts can handle the issue of sport manipulation, which may explain why they have not signed or ratified the Macolin Convention. However, there are risk factors. The sport most at risk for sport manipulation is football, which is played during the European summer months. The attitude of Swedish authorities that the issue is under control 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, however, 2020 was cited as the year that Sweden began to address the seriousness of sport manipulation in their sporting culture with a renewed energy. The Swedish Sports Confederation is preparing education programs for sport federations. In recent years there have been many suspicious reports in Swedish football, and the cases

are allegedly committed by a few select criminal groups. There is space for improvement in cooperation for domestic cases, but it is exceedingly difficult to cooperate internationally due to differences in legislation transnationally, lack of resources and bandwidth in some countries, and issues of jurisdiction when a crime crosses borders. de

### Risk Factors

The following are identified risk factors of match-fixing that exist in Sweden

- a. Denial of the problem
- b. Underpaid referees
- c. Underpaid players
- d. Financial fragility of clubs/teams
- e. End of season matches (particularly those with inconsequential consequences for one or both teams)
- f. Salary delays for players, referees, club officials
- g. Omertà/Fear of reporting incidents
- h. Less attention on competition (media and fans)
- i. League play during summer months
- j. Normalization of gift giving and bribery
- k. Lack of betting restrictions for high-risk games (youth, amateur, lower division, and end of season matches)
- l. E-sports betting popularity and cryptocurrencies allowed in sport betting
- m. Small country
- n. Legislative weakness
- o. Cultural popularity of betting

The sport most at risk for sport manipulation in Sweden, like in almost all cases in Europe, is football. Swedish football is played during the months when the rest of the major European football leagues are on break. There is more gambling activity than similar level leagues because they play their seasons in the summer months. This creates a more liquid market, and the high liquidity in the gambling market is an enabling factor for the fixer.

Sweden has a reputation as being a country with low levels of corruption- Transparency International ranked Sweden 3/180 with a score of 85/100 in 2020 on its Corruption Perception Index. However, Sweden has worryingly been accused of having a naïve and dismissive attitude towards sport



manipulation and corruption in sport. Professor Declan Hill, of New Haven Institute, claimed that Swedish officials and lawmakers have always had a chauvinistic attitude different from the rest of Scandinavia, which makes them less willing to deal with sport manipulation (Littorin, 2018). Swedish officials have publicly expressed their belief that while sport manipulation is an issue in other countries, it is not the case in Sweden. This was their stance in response to the Finland sport manipulation scandal in 2011, and the Norway sport manipulation scandal in 2013. Adelson Lilijeroth, the Swedish Minister of Sport at the time, made a public statement in 2011 that sport manipulation is not a problem in Swedish sport and that Sweden's legislation and preventative efforts could efficiently handle the problem. It comes as no great surprise then that Sweden is the only Scandinavian country that did not sign the Macolin Convention.

This lack of appreciation for the risk of sport manipulation by some Swedish authorities is a significant risk factor. The evidence of sport manipulation in the country is significant, as is detailed below in the report. A continued failure to recognize the problem by Swedish authorities could prove extremely problematic for dealing appropriately with sport manipulation, presenting obstacles for those stakeholders that are working diligently to address the problem, and it makes Sweden an attractive potential market for fixers. Hopefully, increased awareness about the issues and the recent cases, particularly in the last 5 years, will alter this attitude. In 2015, Lilijeroth admitted she was wrong and that Swedish sports administrators had misled her.

### **Whistleblowing**

In June 2020, a proposal for a new Swedish whistleblower protection law was announced. As a result, Sweden became the first European Union (EU) member state to publish a suggested enactment of the EU Whistleblower Protection Directive. The requirements mandated by law will be to implement secure reporting channels, communicating of reporting options, protection of whistleblowers against retaliation, assignment of a suitable/impartial responsible for the

channel, and acknowledgment of reports within 7 days and further feedback within 3 months of the report. Organizations that do not do this can be penalized.

The proposed law also protects the anonymity of reporting infringements under Swedish law. It goes even further to covers the reporting of information about circumstances that need to be exposed in the interests of the general public.

Whistleblower protection varies amongst the relevant authorities. The Swedish Sports Confederation provides the primary whistleblower function, while there is no work being done with whistleblowing protection at the Swedish National Platform, at the time of writing. The Swedish Gambling Authority has a function for alerts, but this is not specifically linked to sport manipulation. There are limited legal protections for whistle-blowers unless there is a strong threat of violence.

### **Relevant Stakeholders**

Good practice measures are shared between sport federations, but for most federations there are no structures with standards of good practices from international stakeholders. Each individual sport federation is responsible for educating, investigating, and punishing sport manipulation incidents. The Swedish Sports Confederation represents and supports various sport federations in their work against sport manipulation.

#### *Swedish Football Association (SvFF)*

The SvFF is the only sport federation that has a working department for the investigation of sport manipulation. They also have a strong relationship of cooperation with the Swedish police.

#### *Partnership with the Betting Industry:*

SvFF shares information with ULIS/ex-GLMS through Svenska Spel, which is ULIS' national member lottery.

In addition, the SvFF works with local private betting operators to restrict betting offered for certain options, such as lower league matches and youth team matches.

#### *National Platform (NP)*

The main goal of the NP is to promote strategic and operational collaboration in

the efforts against sport manipulation. The National Platform is led by the Gambling Authority and consists of the Ministry of Finance, the Ministry of Culture, the Public Prosecutor's Office, the Police Authority, the Swedish Sports Confederation, and the gambling industry. The NP does not collect information or share it, rather it exchanges information between its members. This information is not related to investigations or cases themselves of sport manipulation. As of writing, the NP has no legal basis to assist with investigations or prosecutions.

*National Council for Crime Prevention (NCCP)*

The NCCP is a Swedish government agency under Ministry of Justice that acts as a research center for the criminal judicial system. They promote crime prevention work and contribute to the development of criminal policy in Sweden. The NCCP is an important part of the overall fight against sport manipulation in Sweden because of

the research they do related to legislation and efficacy of preventative measures.

*Match-Fixing Council (MFC)*

The MFC is a large, cooperative multi-stakeholder endeavor, which includes participation from the Swedish Prosecution Authority, Swedish Police, government, Swedish Trade Association for Online Gambling, Swedish Gambling Association, Swedish Gambling Authority and Swedish Sports Confederation. Unfortunately, operational success is difficult because of current regulations that prevent stakeholders from collaborating and sharing data.

It is notable that betting operators are able to report relevant information to the police authorities, but sharing information related to personal data between the operator or independent organizations has proven to be difficult.

## 6. Future Challenges posed by the threat of manipulations of sports competitions

Over the course of the project, as well as since its first edition since 2019, several new technology-inspired challenges have manifested. These challenges were influenced by the COVID-19 pandemic. Covid-19 emphasized the use of technology

as a means to communicate and issue financial transactions, as well as resulting in a lack of major traditional sports competitions for a considerable period of time. These new risks that stakeholders must address are listed below.

### 6.1. Esports

Recently, there has been an explosive increase in popularity for esports that is an area of concern for the partner countries and countries around the globe. Esports can be defined as video or computer games played competitively. Esports match-fixing incidents are increasing due to the recent increases in popularity, revenue generated, and developments in the esports betting market, not to mention the onset of the COVID-19 pandemic, which halted most competitive onsite sports events. Increased esports popularity is reflected by the revenue generated by the esports betting market, with an estimated 7.4 billion USD wagered in esports in 2016. In August 2015, a report issued by Eilers Research projected that esports wagering would reach \$23.5 billion by the year 2020. Even though legal sports bets in esports often have small limits and limited options, individuals can use unregulated and offshore betting sites with more options and higher limits. Unsurprisingly, there are various incidents of esports match-fixing occurring in the last decade.

Unregulated gambling and gambling that occurs away from the regulated markets, is evidenced most notably by skin-betting. Skin-betting presents a challenge to esports integrity unique from traditional sports. Skins are in-game cosmetic items in videogames that change the appearance of a character, weapon, or tool. Skins are won during game-play or they can be purchased with real money, and then these skins can be gambled on third-party unregulated sites. In this process, the skin becomes a cryptocurrency that holds monetary value. For example, those watching a professional *Counter-strike* streamed live can place their skins as a wager. Winning a wager leads to

acquisition of more skins, which can be cashed out for traditional currency on website such as *OPskins*. This process allows gamblers to bypass betting restrictions including those that restrict age, location, and limit, resulting in children stealing thousands of dollars for skin-betting. Skin-betting also costs less than regulated gambling because the online transaction of skin to currency operates outside of any government regulation, which eliminates exchange rates and fees.

Perpetrators face a low-risk of detection, because of the prevalence and popularity of unregulated gambling and because of as yet limited regulation of the e-sports scene, from sponsorship to competition organization and rules surrounding players.

The regulatory scene is vast, disjointed, and experiences limited oversight. There are considerable concerns about esports due to these factors, and many of the partner countries expressed concern about increases of incidents and potential incidents of sport manipulation in esports due to the growth in the betting market volume

**Recommendation:** Education and workshops should address the explosive growth of esports and the lack of regulation in the sport, which are always going to be risk factors for sport manipulation. Awareness of this must be improved amongst the betting authorities and law enforcement in the partner countries. Measures should be taken proactively and should mimic the efforts taken in other sports to implement monitoring services, education, and, sanctions, and

whistleblowing mechanisms in relation to esports in the partner countries.

A recognition of the problem of unregulated gambling through skin-betting, an issue unique to esports, must be acknowledged. Awareness of this issue should include identifying why it presents a tempting target for criminals, who can make illicit bets with almost total anonymity. The poorly regulated and unmonitored gambling market of esports is problematic because the most effective strategy for discovering match-fixing relies on monitoring a

regulated betting market. The only current “barrier” to freely placing a bet with skins is the obligation to create a player account for the relevant esports. However, that username and password could be used by anybody. As such, individual countries/ regulatory authorities should consider placing restrictions on accounts that are found to be betting skins. This requires cooperation with the game publishers, who have the ability to track movement of skins on the player accounts, identifying whether those skins are being used for betting purposes.

## 6.2. Virtual Currencies

With the rise of esports, another development in technology poses a risk to sport integrity in the partner countries and around the globe. Detecting manipulation of sports competitions is made possible in part by monitoring the betting market. Notwithstanding this, the advent of cryptocurrencies now allows individuals to gamble online with almost total anonymity. Malta and Cyprus both expressed concerns that cryptocurrency is attractive to criminals in this regard and there exist no contemporary responses to it.

It is now possible to bet on Cloudbet, a betting operator specializing in low level competition, using the cryptocurrency bitcoin. Bitcoin are an online payment instrument acknowledged as a specific tool for carrying out business on the digital black market. Bitcoins prove to be as anonymous as cash transactions given the ease of electronic transfers. Moreover, cryptocurrencies do not require a third party like a bank or credit card provider in the payment process, which means the costs are lower, the transactions operate outside of the government regulation, and the transactions are borderless because there are no exchange rates or fees. This is ideal for criminal activity. Criminals can use cryptocurrency to place bets associated with sport manipulation to avoid detection through the monitoring services that betting operators use.

The betting market has been swift to embrace cryptocurrency, which is proving to be a multi-billion-dollar industry. There

now exist over 120 operators for sports betting through cryptocurrency, each existing outside of licensed markets that offer bitcoin payment. There are also over 25 operators offering cryptocurrency only “end to end” service where you can place a bet with cryptocurrency and receive cryptocurrency as payment. Cryptocurrency sites have distinct advantage over regular betting sites because of the reduced transaction fees and better odds because the bookmakers do not involve themselves at all with the traditional financial gatekeepers, and the transparency provided by blockchain technology offers protection against untrustworthy operators. In addition, the betting operators benefits because cryptocurrency transactions are irreversible.

In addition, beyond betting, cryptocurrency can be used to bribe players and the financial incentive for sport actors and others to engage in the sport manipulation. This adds its own series of challenges, including tracking the bribes and prosecuting players for bribes that come from cryptocurrency. The anonymity cryptocurrency provides allows briber and bribe to escape detection potentially easier compared to the use of traditional currencies. Cryptocurrencies can also be a hurdle for authorities when tackling money laundering using sport and manipulated sport competitions and thus legislation and enforcement measures are of great importance.

**Recommendation: Legislation and law enforcement must address these various**

**issues of cryptocurrency.** The legislation at the time of writing is fragmented, with disagreements whether cryptocurrency is currency at all. The European Union money laundering legislation does not recognize cryptocurrency explicitly, but it is written broadly enough to make money laundering involving cryptocurrency a criminal act as its focus is not on "money" but on "property", which can be understood as assets of any kind whether corporeal or incorporeal, movable, or immovable, tangible, or intangible. One of the key issues is that even if there is oversight and legislation that regulates and tracks the use of cryptocurrency, service providers suitable for money laundering will establish themselves in jurisdictions with little to no oversight, which means international cooperation is required to address the issue of cryptocurrency and betting

There are certain legislative amendments that could prove useful in combatting the

cryptocurrency threat. Crypto wagering should firstly be acknowledged as a form of betting. Secondly, wins on such sites should constitute a financial advantage. Thirdly, bribery involving cryptocurrency should be covered by legislation. Finally, sport manipulation laws and betting regulations that exist in the partner countries could be drafted to cover all games irrespective of the legality of the betting on those games or the form of payment used (traditional or cryptocurrency). Efforts could also be made also bring crypto-wagering markets on legal onshore markets where it can be regulated to some extent. This would allow betting operators to establish who the cryptocurrency owners are through identity checks and enable the sites to require information to offer bets. These efforts should be made because the unregulated offshore sites where no monitoring or tracking occurs are extremely risk for sport manipulation.

## 7. Integrisport Concept Sustainability

Ensuring the sustainability of the Integrisport concept has been a key aim of CSCF and was thus a key outcome of the second edition of the project is the awarding of a third European edition by the European Commission, namely, Integrisport 3.0, a project that will run in a further 6 countries, from 2023 to the end of 2024. This is a strong illustration of the recognition of the

success of the project, which, over the past 5 years in Europe, has been progressively integrating the knowledge of countries in the Integrisport community concerning investigations and prosecutions and fostering the dissemination of the practices far and wide.



The Integrisport Next (2021-2022) awareness raising sessions, the curriculum of the unique educational program, learning materials, survey results, and this Practical Guide have all successfully contributed to the sustainability of the project long after the end of its lifetime, building on the first edition the experiences of the countries and the primary deliverable of the 1<sup>st</sup> edition, [the Integrisport Handbook](#).

The project deliverables and information related to Integrisport Next will be accessible via the Virtual Network Community open to the partners of the projects involved in its first, second and third editions, which, by the end of 2024, will include almost 2/3 of EU countries as well as those beyond the EU and international institutional partners.



- A Virtual Network Community for Sustainability

This virtual network developed and maintained by CSCF since Integrisport 1 (2019-2021), consists of open-access documents pertaining to project findings and impacts that will be available to the project partner countries, and any relevant parties to ensure a continued exchange of practices, actions and investigation and prosecution techniques long after the respective project lifetime through

discussion, contacts and documents. As such, the virtual network provides project sustainability because partners can refer to key documents and contact points in order to develop education sessions, consider better methods of cooperation, identify key stakeholders and so on long after the Integrisport Next Project.

Such efforts work towards the sustainability of the Integrisport community around the EU and beyond, where CSCF and their expert partners continue to support and collaborate with stakeholders across the EU against the integrity threat of sport manipulation.

### Innovative aspects of Integrisport 3.0



Integrisport 3.0 **builds on issues cited by partners in Integrisport Next** and in doing so it will cover whistleblowing, legislative consistency, investigation improvements, esports and virtual currencies, and moving from discovery to prosecution.

In doing so, the impact of Integrisport continues to spread across Europe, adapting to the ever-changing nature of the problem of sport manipulation

## Annexes

### *Cyprus Legislation*

*Manipulation of a sporting event, Article 11.- (1).* Any person, either directly or indirectly, in person or through a third party, attempts to manipulate a sporting event, or contributes in any way to the conduct of a premeditated match is guilty of an offence, is subject to a prison sentence not exceeding seven (7) years or a fine not exceeding two hundred thousand euros (€ 200,000) or both.

(2) The court, when imposing a penalty in accordance with the provisions of this article, may additionally, in case a person obtains any financial benefit as a result of acts of corruption, issue a confiscation order, in accordance with its provisions on Prevention and Combating Legalization Revenue from Illegal Activities Law for the return of the entire amount certified as a financial benefit.

(3) Without prejudice to, and in addition to, any other relevant provisions, the court shall take into account, inter alia, the fact that the accused holds a position of athlete, coach, or referee or that he is involved in committing the offence of an athlete who competed or declared to compete in a race or sporting event. Its provisions on Prevention and Combating Legalization Revenue from Illegal Activities Law for the return of the entire amount certified as a financial benefit.

*Bribery for altering the result of a sporting event, Article 12.* (3) A person who promises, offers, or gives to another person any gift or other benefit, for which there is no legal basis, in order to influence by the last or third person, the development or the final result of a of a sporting event, is guilty of an offence and, in case of conviction, is subject to imprisonment not exceeding five (5) years or a fine not exceeding one hundred thousand euros (€ 100,000) or both (2).

(2) A person who requests, accepts, or receives a gift or other financial benefit for which there is no legal basis, in order to influence, by himself or by a third person,

the development or the final result of a sporting event, is guilty and, in case of conviction, is subject to a prison sentence not exceeding five (5) years or a fine not exceeding one hundred thousand euros (€ 100,000) or to both (2) of these sentences.

(3) Without prejudice to, and in addition to, any other relevant provisions, the court shall take into account, inter alia, the fact that the accused holds a position of athlete or involvement in the commission of the offence when making the sentence particularly serious. Athlete who competed or declared to compete in a sporting event.

*Prohibition of betting by athletes and sports agents, Article 13.* Club or Sports Company or club that is registered as an athlete or holds a partnership contract.

(2) A person holding an administrative or organizational position in a sports federation is prohibited from betting, either in person or through a third party, on a sporting event of any category or event organized or conducted under the responsibility, auspices or authorization of his respective federation.

(3) Any person who fails to comply with the provisions of subsections (1) or (2) shall be guilty of an offence and, if convicted, shall be subject to imprisonment not exceeding three (3) years or to a fine not exceeding seventy-five thousand euros (€ 75,000) or both (2) of these fines.

*Article 14.* (3) For the purposes of compliance with the purpose of this Law, a person who holds the status of athlete or sports agent is not allowed to undertake, act or assist in his person any of the following actions, activities or qualities

(3) To represent or advise athletes;

(b) to hold the license of the addressee or the license of an authorized representative in the Republic or abroad; be directly or indirectly related to a person who is professionally or systematically involved in betting and / or sporting events or has such activity as an ancillary;

It is understood that the prohibitions of the provisions of subsection (1) also apply to the spouses, descendants, relatives and second-degree relatives of the persons referred to in that subsection.

(2) Any person holding the capacity of athlete or sports agent, before accepting any position, position or capacity related to sport, must make a written statement to the body that appoints him in relation to any existing under the provisions of this Law is incompatible and, in case of finding incompatibility, the said person is not allowed to accept the position or position offered to him, unless he previously makes a written statement of commitment to resign or terminate, within a reasonable time, by the specific financial transaction, relationship or property that is incompatible.

(3) Failure to declare the incompatibility or failure to fulfill the commitment to resign or terminate it, after finding an incompatibility, in accordance with the provisions of subsection (2), constitutes, regardless of the provisions of any other law, a lawful reason to revoke or terminate that appointment.

(4) A person who violates the provisions of paragraph (1) is guilty of an offence and, in case of conviction, is subject to imprisonment not exceeding three (3) years or to a fine not exceeding seventy-five thousand euros (€ 75,000) or in both (2) of these penalties.

*Providing Confidential Information, Article 15.* (3) The disclosure of confidential information, as defined in the provisions of Article 2, concerning a specific sport, or a sports club or team, either directly or indirectly, in person or through a third party, is prohibited.

(2) In case a person violates the provisions of this article is guilty of an offence and, in case of conviction, is subject to a fine not exceeding ten thousand euros (€ 10,000).

*Obligation to report / provide information, Article 16.* (3) Every athlete and every sports agent are obliged to report or report or provide any information or data to the Commission directly, regarding acts of corruption in sport, which have come to his

notice or come to any knowledge in any way. Of or in his possession.

(2) Any person who holds the license of an addressee or is the holder of a license of an authorized representative shall be obliged to immediately inform the Commission of any information and / or data which he holds, collects, has come to his notice or knows in any way, whether they arise before the start, during or after the end of the sport match and / or event and concern suspicious betting activity:

It is understood that in the event that a person fails to comply with the obligations set out in the provisions of subsection (2), the Commission shall immediately inform the National Betting Authority which, regardless of any criminal offence, shall act in accordance with the provisions of the Betting In such a case, the latter may, if it deems it appropriate, revoke or suspend the authorization granted.

(3) A person who knowingly omits or conceals or conceals data or information in accordance with the provisions of subsections (1) or (2) is guilty of an offence and, in the event of conviction, is subject to imprisonment of not more than three (3) years or a fine not exceeding seventy-five thousand euros (€ 75,000) or both (2):

It is understood that the obligation in subsection (1) also covers cases where the federation concerned receives from the European or world federation to which it belongs, a report of suspicious betting activity or suspected match-fixing:

It is further understood that the obligation to report and provide information extends to all information received by that federation which must be provided in its original form together with a summary report from the federation concerned to the Commission.

*Providing false or misleading information, Article 17.* A person who, while providing information for any of the purposes of the provisions of this Law or the current legislation, makes a false, misleading or misleading statement regarding any of its elements or conceals evidence or omits the submission of data or in any way prevents the immediate collection of information or

the conduct of an investigation either by the Commission or by an investigating officer, appointed by it, commits an offence and in case of conviction, is subject to imprisonment not exceeding three (3) years or a fine not exceeding seventy-five thousand euros (€ 75,000) or both.

### *Estonian Legislation*

#### **Estonian Criminal Code (ECC).**

<https://www.riigiteataja.ee/en/eli/522012015002/consolide>.

An update was made in 2015 to the ECC related to fraud (Kairjak, 2015). The following are noteworthy:

- The distinction between bribes and gratuities has been quashed, and sections 293, 295 and 297 have

*Subsection 209: Fraud.* Perli admits that this subsection is difficult to use in sport competition manipulation cases (FFM Estonia, 2021). This is problematic, and it explains why punishing those that manipulate sporting matches remains difficult in the court of law. If they cannot use the fraud statute, then Estonia lacks the legal capacity to investigate and subsequently sanction sport competition manipulation effectively. The Fraud statute described below can be found at <https://www.riigiteataja.ee/en/eli/522012015002/consolide>.

- (1) Causing of proprietary damage to another person by knowingly causing a
  - a. misconception of existing facts for the purpose of significant proprietary benefit is punishable by a pecuniary punishment or up to four years' imprisonment.
- (2) The same act, if committed:
  - a. by a person who has previously committed theft, robbery, embezzlement, acquisition, storage or marketing of property received through commission of an offence, intentional damaging or destruction of a thing, fraud, or extortion;
  - b. by an official;
  - c. on a large-scale basis;
  - d. by a group; or

been deleted from the Code, whereas the offences criminalizing accepting, arranging receipt, and giving bribes are intended to cover all acts blanketed by former offences of bribes and gratuities;

- Private sector offences are new to the ECC 2015. Existing offences were annulled and a new offence – sections 4023 and 4024 – criminalizes the accepting or giving of bribes by a person entitled to act in the interests of the company;
- Foreign officials are liable under the ECC, which means the same terms apply to them; yet
- Unfortunately, there are no fines specified under the punishment section for fraud

e. by addressing the public; is punishable by one to five years' imprisonment.

- (3) An act provided for in subsection (1) or (2) of this section, if committed by a legal person, is punishable by a pecuniary punishment.
- (4) For criminal offence provided for in clauses (2) 2) and 3) of this section, the court may impose extended confiscation of assets or property acquired by the criminal offence pursuant to the provisions of § 83<sup>2</sup> of this Code.

Penalties. Art. 209 (1) - pecuniary punishment or imprisonment up to three years Art. 209 (2) - imprisonment from one to five years.

Art. 209 (3) – pecuniary punishment

**Sport Act (2005).** Passed in 2005, this Act includes the bases for the organization of National Contact Points against the manipulation of sport events. It also outlines the requirements for the organization of sport events, and the liability for the violation of those same requirements. ESCTCIS is designated as this National Contact Point in Estonia until a National Platform is formally established.

*Article* 11.  
<https://www.riigiteataja.ee/en/eli/ee/509062014002/consolide/current>. National contact point against manipulation of sports

competitions. National contact point (hereinafter contact point) shall be established for fighting against manipulation of sports competitions, which shall:

- collect and forward information concerning fighting against manipulation of sports competitions to relevant organisations and agencies;
- coordinate fighting against manipulation of sports competitions;
- receive, aggregate and analyse information on unusual and suspicious bets made regarding sports competitions taking place in Estonia and issue warnings, if necessary;
- forward information on potential violations to state agencies, sports organizations or organisers of sports bets; and
- cooperate with all organisations and relevant agencies on national and

international level, including with the contact points of other states.

The functions of the contact point shall be performed by the Ministry of Culture. The Minister of Culture may, based on an administrative contract, transfer the functions of the contact point to a legal person in private law. Upon entry into an administrative contract, supervision over compliance therewith shall be exercised by the Ministry of Culture.

If the administrative contract specified is terminated unilaterally or in case of another reason preventing the executor of the administrative function from the performance of the administrative function, the subsequent performance of the administrative function shall be organized by the Ministry of Culture. [RT I, 28.02.2020, 1 – entry into force 01.03.2020]

### ***Finland Legislation***

*Section 13 – Giving of bribes (604/2002).*  
(<https://www.finlex.fi/en/laki/kaannokset/1889/en18890039.pdf>).

(1) A person who promises, offers, or gives to a public official in exchange for his or her actions in service a gift or other benefit intended for him or her or for another, that influences or is intended to influence or is conducive to influencing the actions in service of the public official, shall be sentenced for the giving of bribes to a fine or to imprisonment for at most two years.

(2) Also, a person who, in exchange for the actions in service of a public official, promises, offers, or gives the gift or benefit referred to in subsection 1 shall be sentenced for bribery.

*Section 14 - Aggravated giving of bribes (563/1998). If in the giving of bribes.* (1) the gift or benefit is intended to make the person act in service contrary to his or her duties with the result of considerable benefit to the briber or to another person or of considerable loss or detriment to another person, or

(2) the value of the gift or benefit is considerable, and the bribery is aggravated also when assessed as whole, the offender

shall be sentenced for aggravated giving of bribes to imprisonment for at least four months and at most four years.

*Section 7 – Giving of bribe in business (637/2011).* A person who promises, offers or gives an unlawful benefit (bribe) to

- (1) a person in the service of a business,
- (2) a member of the administrative board or board of directors, the managing director, auditor or receiver of a corporation or of a foundation engaged in business,
- (3) a person carrying out a duty on behalf of a business, or

(4) a person serving as an arbitrator and considering a dispute between businesses, between two other parties, or between a business and another party intended for the recipient or another, in order to have the bribed person, in his or her function or duties, favour the briber or another person, or to reward the bribed person for such favouring, shall be sentenced, unless the act is punishable on the basis of Chapter 16, section 13 or 14, for giving of bribes in business to a fine or to imprisonment for at most two years.

Section 7(a) – Aggravated giving of bribes in business (637/2011). If in the giving of bribes in business



(1) the gift or benefit is intended to make the person in question serve in his or her function in a manner that results in considerable benefit to the briber or to another person, or in considerable loss or detriment to another person,

(2) the gift or benefit is of considerable value, and the giving of a bribe in business is aggravated also when assessed as a whole, the offender shall be sentenced for aggravated giving of bribes in business to imprisonment for at least four months and at most four years.

*Section 8 – Acceptance of a bribe in business (637/2011).* A person who

(1) in the service of a business,

(2) as a member of the administrative board or board of directors, the managing director, auditor or receiver of a corporation or of a foundation engaged in business

(3) in carrying out a duty on behalf of a business, or

(4) in serving as an arbitrator considering a dispute between businesses, between two other parties, or between a business and another party demands, accepts or receives a bribe for himself or herself or another or otherwise takes an initiative towards receiving such a bribe, for favouring or as a reward for such favouring, in his or her function or duties, the briber or another, shall be sentenced, unless the act is punishable in accordance with Chapter 40, sections 1 – 3, for acceptance of a bribe in business to a fine or to imprisonment for at most two years.

*Section 8(a) – Aggravated acceptance of a bribe in business (637/2011).* If in the giving of a bribe in business

(1) the offender acts or the intention of the offender is to act in his or her function, due to the gift or benefit, to the considerable benefit of the briber or of another person or to the considerable loss or detriment of another person, or,

(2) the value of the gift or benefit is considerable and the giving of a bribe in business is aggravated also when assessed as whole, the offender shall be sentenced for aggravated giving of a bribe in business to imprisonment for at least four months and at most four years.

*Chapter 36 - Fraud and other dishonesty (769/1990) Section 1 - Fraud (769/1990).*

(1) A person who, in order to obtain unlawful financial benefit for himself or herself or another or in order to harm

another, deceives another or takes advantage of an error of another so as to have this person do something or refrain from doing something and in this way causes economic loss to the deceived person or to the person over whose benefits this person is able to dispose, shall be sentenced for fraud to a fine or to imprisonment for at most two years.

(2) Also a person who, with the intention referred to in subsection 1, by entering, altering, destroying or deleting data or by otherwise interfering with the operation of a data system, falsifies the end result of data processing and in this way causes another person economic loss, shall be sentenced for fraud. (514/2003)

(3) An attempt is punishable.

*Section 2 - Aggravated fraud (769/1990) (1)* If the fraud.

(1) involves the seeking of considerable benefit,

(2) causes considerable or particularly significant loss

(3) is committed by taking advantage of special confidence based on a position of trust or

(4) is committed by taking advantage of a special weakness or other insecure position of another and the fraud is aggravated also when assessed as a whole, the offender shall be sentenced for aggravated fraud to imprisonment for at least four months and at most four years. (2) An attempt is punishable. As noted above, the Code does include provisions that can apply to sport competition manipulation indirectly based on fraud and/or bribery statutes (Ek & Hilma-Karoliina, 2020). Sport competition manipulation is prosecuted as bribery in business in non-betting related match-manipulation. If Veikkaus, the betting monopoly in Finland, is deceived in betting-related sport competition manipulation, the provision of fraud is applied (Peurala, 2013). Causing economic loss is also one of key elements of fraud provisions, so importantly this charge of fraud is not applicable for non-betting related sport competition manipulation.

The intention of fixers matters in relation to the criminal code. In order for bribery to be punishable, the benefit given must influence, be intended to influence, or be conducive to influencing, the actions of the official. The benefit does not have to actually influence action, the

intent to have influence is sufficient to constitute bribery (Kimpimäki, 2018). A common basis on which the offence of bribery may be deemed aggravated is the gift or benefit having considerable value. The following is noteworthy:

- a. The scales of punishment are the same for bribery in the private sector and the public sector. This is a new development, as bribery in business was long considered somewhat less reprehensible than bribery of public officials;
- b. Acceptance of a bribe is punishable under chapter 40, section 1. Punishment for acceptance of a bribe is the same for giving of a bribe, ranging from a fine to a maximum of two years' imprisonment (Viljanen, 2014). The punishment for aggravated giving of a bribe, or aggravated acceptance of a bribe, is imprisonment ranging from four months to four years:
  - Companies can receive a corporate fine of 850-850,000 euros. If convicted of bribery offences companies also face debarment from public procurement contracts, if company or its representatives were convicted of bribery during the past five years;
  - Individuals and companies can also face confiscation of proceeds of crimes arising from the bribery offence. This could include the value of the bribe in addition to the profits made from the bribe.

#### **Associations Act (503/1989).**

[https://www.legislationline.org/download/id/7553/file/Finland\\_Associations\\_Act\\_1989\\_am2016\\_en.pdf](https://www.legislationline.org/download/id/7553/file/Finland_Associations_Act_1989_am2016_en.pdf). Finnish sport is organized on the principle of autonomy of associations. Nevertheless, this Act outlines specific rules for decision-making and disqualifications for sport organizations (Ek & Hilma-Karoliina, 2020). Common rules for good governance in Finnish sport is self-regulatory but the framework is binding on the federations only if they have specifically committed to its use. The Act holds sport organizations accountable under criminal liability. Notably, however, this liability requires willfulness or negligence in the acts of sport competition manipulation.

*Act on the promotion of sports and physical activity (390/2015).*

[https://www.finlex.fi/fi/laki/kaannokset/2015/en20150390\\_20150390.pdf](https://www.finlex.fi/fi/laki/kaannokset/2015/en20150390_20150390.pdf).

*Section 1. Scope of application* 1. This Act sets out provisions on the promotion of physical activity and top-level sports; the responsibilities of and cooperation between central and local government; the government administrative bodies; and the funding to be provided by the state in the field of sports and physical activity. 2. Aside from the provisions of this Act, Finland shall comply with her international obligations under the relevant treaties.

*Section 2. Objective of the Act* 1. The objective of this Act is to promote:

- (1) the opportunities of various demographic groups to engage in physical activity;
- (2) the wellbeing and health of the population;
- (3) the maintenance and improvement of the capacity for physical activity;
- (4) the growth and development of children and young people;
- (5) civic action in the field of physical activity including club activities;
- (6) top-level sports;
- (7) integrity and ethical principles in the context of physical activity and top-level sports; and
- (8) greater equality in sports and physical activity.

2. The efforts to achieve these objectives are based on the principles of equality, nondiscrimination, social inclusion, multiculturalism, healthy lifestyles, respect for the environment and sustainable development.

*Section 4. State's responsibility.*

1. The Ministry of Education and Culture is responsible for the overall management, coordination and development of the national sports policy, and for the creation of favourable conditions for engaging in physical activity.
2. Responsibility for local administrative duties rests with the Regional State Administrative Agencies. More detailed provisions on these duties shall be issued by government decree.
3. When performing the duties defined herein, the State shall, as appropriate, engage in cooperation with municipalities, non-governmental

organisations and other actors in the field of physical activity and sports.

### *Georgia Legislation*

#### **Criminal Code: Article 203 – Sports Bribery.**

<https://matsne.gov.ge/en/document/view/16426?publication=209>.

Bribing Participant or Organizer of Professional Sports Competition or Commercial-Spectacular Contests

1. Bribing, a participant, referee, coach, team leader or organizer of sports competition, as well as an organizer of commercial-spectacular event or a member of the jury, intended to influence the result of the competition or consent, shall be punishable by socially useful labour from one hundred and twenty to one hundred and eighty hours in length or by corrective labour extending from six months to one year or by jail sentence for up to two months in length.
2. The same action committed: a) by an organized group; b) repeatedly, shall be punishable by restriction of freedom for up to three years in length or by imprisonment for the term not in excess of five years.
3. Illegally receiving money, securities, or any other property or enjoying property service by a participant of professional sports competition intended to influence the result of the competition or contest,  
- shall be punishable by imprisonment for up to two years in length, by deprivation of the right to occupy a position or pursue a particular activity for the term not in excess of three years.
4. Illegally receiving money, securities or other property or enjoying property services by a referee, coach, team leader or organizer, or an organizer or member of the jury of a commercial-spectacular contest, intended to influence the result of the competition or contest, shall be punishable by fine or by jail sentence for up to a three-year term, by deprivation of the right to occupy a position or pursue a particular activity for the term not in excess of three years. Note: Criminal liability shall be lifted up from the person who voluntarily declares to a governmental authority that he/she has

given money, securities or other property or has rendered property service to one of the persons referred to in Paragraph 1 of this Article.

Paragraph III and IV of the Criminal Code of Georgia, which envisage from 4 to 6 years of imprisonment:

- bribing a participant or organization in a professional sport or commercial entertaining competition, this is considered a corruption-related offence;
- Their bribery statutes are consistent with international standards;
- conviction of bribery does not require proof that bribe influenced public official, and just the offer of the bribe, without briber taking further steps, constitutes criminal offence;
- As of 2015 Article 203 had only investigated 3 persons with 8 prosecutions actually sanctioned (Statistical data from Government of Georgia in Anti-Corruption Reforms in Georgia, 2016).

#### **Criminal Code: Article 221 – Commercial Bribery.**

<https://matsne.gov.ge/en/document/view/16426?publication=209>

1. Promising, offering, transferring or rendering, directly or indirectly, money, securities, other property or property-services and/or other undue advantage to a person holding managerial, representative or other special powers in an enterprise or organisation or working in that enterprise or organisation, in his/her or other person's favour, in order that he/she act or refrain from certain actions, in violation of his/her official duties, – shall be punished by a fine or house arrest for a term of six months to one year, or imprisonment for up to three years, with or without deprivation of the right to hold an office or to carry out activities for up to three years.
2. The same act committed:
  - a) by a group of persons;
  - b) repeatedly, – shall be punished by a fine or imprisonment for a term of two to four years, with deprivation of the right to hold an office or to carry out activities for up to three years.

3. Request or acceptance of offering, promise, transfer or services, directly or indirectly, of money, securities, other property or property services and/or of other undue advantage by a person holding managerial, representative or other special powers or working in an enterprise or organisation, for his/her or another person's benefit, in order for that person to act or refrain from taking certain actions, in violation of his/her official duties in the interests of the briber or any other person, – shall be punished by a fine or house arrest for a term of one to two years, or by imprisonment for a term of two to four years, with deprivation of the right to hold an office or to carry out activities for up to three years.

4. The act provided for by paragraph 3 of this article which has been committed:

- jointly by more than one person;
- repeatedly;
- by extortion, –

shall be punished by a fine or imprisonment for a term of four to six years, with deprivation of the right to hold an office or to carry out activities for up to three years.

Note:

1. A person who commits the act provided for by paragraph 1 or 2 of this article shall be discharged from criminal liability if he/she voluntarily notifies the agency conducting criminal proceedings of such commission. A decision to discharge a person from criminal liability shall be made by the agency conducting criminal proceedings.

### ***Malta Legislation***

#### **Criminal Code: Article 203 – Sports Bribery.**

<https://matsne.gov.ge/en/document/view/16426?publication=209>. Bribing Participant or Organizer of Professional Sports Competition or Commercial-Spectacular Contests

1. Bribing, a participant, referee, coach, team leader or organizer of sports competition, as well as an organizer of commercial-spectacular event or a member of the jury, intended to influence the result of the competition or contest, shall be punishable by socially useful labour from one hundred and twenty to one hundred and eighty hours in

2. For the act provided for by this article, a legal person shall be punished by liquidation or with deprivation of the right to carry out activities and with a fine.

#### **Criminal Code: Article 180 – Fraud.**

<https://matsne.gov.ge/en/document/view/16426?publication=209>

1. Fraud, i.e. taking property of another person or obtaining of title to the property by deceit for its unlawful appropriation, – shall be punished by a fine or community service from 170 to 200 hours, or by corrective labour or house arrest for a term of one to two years or imprisonment for a term of two to four years.

2. The same act:

- committed by more than one person with a prior agreement;
- causing substantial damage, –

shall be punished by a fine or imprisonment for a term of four to seven years.

3. The same act committed:

- using the official position;
- in large quantities;
- repeatedly;

shall be punished by a fine or imprisonment for a term of six to nine years.

4. The same act committed:

- by an organised group;
- by a person who has two or more previous convictions for unlawful appropriation or extortion of another person's property, –

shall be punished by imprisonment for a term of seven to ten years.

length or by corrective labour extending from six months to one year or by jail sentence for up to two months in length.

2. The same action committed: a) by an organized group; b) repeatedly, shall be punishable by restriction of freedom for up to three years in length or by imprisonment for the term not in excess of five years.

3. Illegally receiving money, securities, or any other property or enjoying property service by a participant of professional sports competition intended to influence the result of the competition or contest, - shall be punishable by imprisonment for up

to two years in length, by deprivation of the right to occupy a position or pursue a particular activity for the term not in excess of three years.

4. illegally receiving money, securities or other property or enjoying property services by a referee, coach, team leader or organizer, or an organizer or member of the jury of a commercial-spectacular contest, intended to influence the result of the competition or contest, shall be punishable by fine or by jail sentence for up to a three-year term, by deprivation of the right to occupy a position or pursue a particular activity for the term not in excess of three years. Note: Criminal liability shall be lifted up from the person who voluntarily declares to a governmental authority that he/she has given money, securities or other property or has rendered property service to one of the persons referred to in Paragraph 1 of this Article.

Paragraph III and IV of the Criminal Code of Georgia, which envisage from 4 to 6 years of imprisonment:

- bribing a participant or organization in a professional sport or commercial entertaining competition, this is considered a corruption-related offence;
- Their bribery statutes are consistent with international standards;
- conviction of bribery does not require proof that bribe influenced public official, and just the offer of the bribe, without briber taking further steps, constitutes criminal offence;
- As of 2015 Article 203 had only investigated 3 persons with 8 prosecutions actually sanctioned (Statistical data from Government of Georgia in Anti-Corruption Reforms in Georgia, 2016).

#### **Criminal Code: Article 221 – Commercial Bribery.**

<https://matsne.gov.ge/en/document/view/16426?publication=209>

1. Promising, offering, transferring or rendering, directly or indirectly, money, securities, other property or property-services and/or other undue advantage to a person holding managerial, representative or other special powers in an enterprise or organisation or working in that enterprise or

organisation, in his/her or other person's favour, in order that he/she act or refrain from certain actions, in violation of his/her official duties, – shall be punished by a fine or house arrest for a term of six months to one year, or imprisonment for up to three years, with or without deprivation of the right to hold an office or to carry out activities for up to three years.

2. The same act committed:

- a) by a group of persons;
- b) repeatedly, – shall be punished by a fine or imprisonment for a term of two to four years, with deprivation of the right to hold an office or to carry out activities for up to three years.

3. Request or acceptance of offering, promise, transfer or services, directly or indirectly, of money, securities, other property or property services and/or of other undue advantage by a person holding managerial, representative or other special powers or working in an enterprise or organisation, for his/her or another person's benefit, in order for that person to act or refrain from taking certain actions, in violation of his/her official duties in the interests of the briber or any other person, – shall be punished by a fine or house arrest for a term of one to two years, or by imprisonment for a term of two to four years, with deprivation of the right to hold an office or to carry out activities for up to three years.

4. The act provided for by paragraph 3 of this article which has been committed:

- a) jointly by more than one person;
- b) repeatedly;
- c) by extortion, –

shall be punished by a fine or imprisonment for a term of four to six years, with deprivation of the right to hold an office or to carry out activities for up to three years.

Note:

1. A person who commits the act provided for by paragraph 1 or 2 of this article shall be discharged from criminal liability if he/she voluntarily notifies the agency conducting criminal proceedings of such commission. A decision to discharge a person from criminal liability shall be made by the agency conducting criminal proceedings.

2. For the act provided for by this article, a legal person shall be punished by liquidation or with deprivation of the right to carry out activities and with a fine.



### **Criminal Code: Article 180 – Fraud.**

<https://matsne.gov.ge/en/document/view/16426?publication=209>

1. Fraud, i.e. taking property of another person or obtaining of title to the property by deceit for its unlawful appropriation, – shall be punished by a fine or community service from 170 to 200 hours, or by corrective labour or house arrest for a term of one to two years or imprisonment for a term of two to four years.

2. The same act:

a) committed by more than one person with a prior agreement;  
b) causing substantial damage, – shall be punished by a fine or imprisonment for a term of four to seven years.

3. The same act committed:

a) using the official position;  
b) in large quantities;  
c) repeatedly;

shall be punished by a fine or imprisonment for a term of six to nine years.

4. The same act committed:

a) by an organised group;  
b) by a person who has two or more previous convictions for unlawful appropriation or extortion of another person's property, – shall be punished by imprisonment for a term of seven to ten years.

### ***Sweden Legislation***

**Sport Competition Manipulation Laws.** On January 1, 2019, the new [Gambling Act](#) made sport competition manipulation a criminal offence with a maximum penalty of two years in jail (McDonald, et al., 2021; Balsam, 2020). The law punishes gambling fraud related to manipulation in sports, whereby an individual or individuals arrange an outcome or event in a match in order to gain monetary benefit. If considered severe, the sentence ranges from 6 months to 6 years imprisonment. There is also the legislation on bribery and severe bribery, with the same penalties as above. This legislation criminalizes offering, giving, demanding, and receiving undue benefit to influence matches.

Approximately 15 cases concerning gambling fraud have occurred since 2019 and have been tried under the new Gambling Act. These cases have resulted in 3-4 convictions (Uddeholt, 2021).

**Swedish Gambling Act (2019 Update).** As explained above, the new Gambling Act came into effect January 1, 2019 (McDonald & McDonald, 2019). What used to be a monopoly system now allows private gambling operators to apply for licenses and to offer online commercial gambling to Swedish consumers (McDonald & McDonald, 2019; FFM Sweden, 2021). The old legislation was overhauled in response a number of issues. Firstly, 54 cases of sport competition manipulation were suspected to have occurred between

2012-2017, but only four of those led to criminal convictions (Balsam, 2020). Secondly, the old Act allowed for a "grey" market to exist because international operators targeted the Swedish market online from abroad, meaning Swedish officials had no jurisdiction to monitor these operators. This market existed because the operators had licenses in other jurisdictions, such as Malta and Gibraltar, and they could exercise their right to provide cross-border services within the EU. Finally, Sweden gambling operators wanted to reduce the monetary loss resulting from such a market. Allegedly 6.7 million SEK of the 23.4 SEK generated by Swedish gambling market in 2018 came from these operators without a Swedish license (McDonald & McDonald, 2019).

Six different licenses are now available, and two of these (commercial online gambling and for betting) can be granted to any operator including private gambling operators who satisfy a set of formal requirements.

**Impact of the Act.** The SvFF is not fully supporting this new Act and they have appealed the issuing of betting licenses specifically (McDonald & McDonald, 2019). They believe that the new market does not do enough to deter or prevent sport competition manipulation and that the gambling authority should have limited possibilities to offer in-play betting, and betting on lower leagues. The SvFF has been unsuccessful in their appeals because they do not have sufficient interest in licensing

decisions to have the right to appeal. Their opposition is in parallel to the case of the English FA, who in 2017 ended their agreement with Ladbrokes and announced it would no longer have a betting partner. By contrast, however, the SvFF still retains state-owned Svenska Spel as their primary sponsor (McDonald & McDonald, 2019)

**Whistleblowing Protection Directive (Proposal) (Henriksson, 2020).** In June 2020, a proposal for a new Swedish whistleblower protection law was announced. As a result, Sweden became first European Union (EU) member state to publish suggested enactment of the EU Whistleblower Protection Directive. The requirements mandated by law will be to implement secure reporting channels, communicating of reporting options, protection of whistleblowers against retaliation, assignment of a suitable/impartial responsible for the channel, and acknowledgment of reports within 7 days and further feedback within 3 months of the report. Organizations that do not do this can be penalized.

The proposed law also protects the anonymity of reporting infringements under Swedish law (Henriksson, 2020). It goes even further to covers the reporting of information about circumstances that need to be exposed in the interests of the general public