

ABOUT SEPARATE CURRICULUM OF THE AWARENESS RAISING PRACTICAL SESSION FOR CYPRUS

This curriculum was prepared by CSCF Sport Integrity in collaboration with Cyprus. The purpose of the curriculum was to fully understand the phenomenon and the motives of the sport competition manipulation that impacts sports in Cyprus. This document formed the basis of the tailored Awareness Raising Practical Session based on the research performed in the previous phase of the project. This curriculum contains all the aspects, modus operandi, legal and policy issues that should be used in sport manipulation related investigations. It covers the presentations of all lecturers, as well as case studies and other materials relevant to the situation in Cyprus.



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INTEGRISPORT NEXT - SEPARATE CURRICULUM OF THE AWARENESS RAISING PRACTICAL SESSION FOR CYPRUS



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INTELLECTUAL OUTPUT 4

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

Coordinator



Partner Organisations



Supporting Partner



Country Partner



We stand against manipulation in sport!

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

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Foreword

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

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

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

This curriculum is one of the results of the project, being part of the Implementation Phase of the project and it formed the basis of the tailored Awareness Raising Practical Session (ARPS) in the country. It contained all the aspects, concepts, legal and policy issues that should be used in sport manipulation related investigations. It covered the presentations of the speakers as well as case studies and other materials.

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

Acknowledgement

The final report was produced between Q3 2021 and Q2 2022. CSCF Foundation for Sport Integrity (CSCF) acknowledges with gratitude the European Commission - Education, Audiovisual and Culture Executive Agency and Its Erasmus+ Programme - and all those who have contributed their expertise and knowledge to the development of this report, in particular our project Partner – **The Cyprus Police** - and the valuable contributions and expertise of the CSCF experts and staff members.

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

Introduction

This introduction provides an overview of the structure of this curriculum report, provided and delivered by CSCF, by describing the relevant sections. The purpose of the curriculum is to fully understand the phenomenon and the motives of the sport competition manipulation that impacts Sports in Cyprus

Section One describes the IntegriSport project and its overall purpose. It includes a description of the Awareness Raising Practical Session (ARPS) that occurred in Cyprus and the methodology of the curriculum.

Section Two begins with by outlining relevant concepts and definitions relevant to sport competition manipulation. It also describes sport competition manipulation, including definitions and background on the topic. This section additionally lists the project topics and the relevant international stakeholders of the project.

Section Three explains the situation of sport competition manipulation in Cyprus. A comprehensive background is provided that explains what risk factors exist in Cyprus, cases of sport competition manipulation, the relevant stakeholders, and regulations in place.

Section Four lists the main issues that were discovered during the project, and possible responses for each problem that Cyprus could pursue in their fight against sport competition manipulation. These possible responses are based on the findings from the desk research of the project, relevant surveys, the ARPS, and opinions of relevant experts.



SECTION 1

ABOUT INTEGRISPORT NEXT
AND THE CURRICULUM



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1. About IntegriSport Next and the Curriculum

1.1. About IntegriSport Next Project

The IntegriSport Next project, organized by CSCF, aims at dealing with the threat of match-fixing. This project provides theoretic and practical support for law enforcement and judicial authorities to fight against sport manipulation and corruption in sport. The Project will help law enforcement and judicial authorities understand the different approaches (sport, betting, virtual currencies) of the phenomenon in order to lead effective processes against the criminals who commit sport manipulation and create effective cooperation between private and public organizations at national and transnational level. IntegriSport Next also gives practical support. It offers peer-to-peer meetings for law enforcement and judiciaries from different countries, allowing them to discuss the proper investigative techniques and the use of legal instruments at national and international level to be effective in the criminal procedure regarding match fixing. Also, it creates a chance for law enforcement and judiciaries to invite experts to support their criminal procedures with their expertise of law, law enforcement, sport, betting and virtual currency.

IntegriSport Next E+ (2021-2022) is coordinated by CSCF and partners with:

Country Partners: The Cyprus Police; the Estonian Police and Border Guard Board; the Finnish Center for Integrity in Sports; the Ministry of Culture, Sport and Youth of Georgia; the Malta Police Force; and the Swedish Sports Confederation.

Partner Organizations: Katholieke Universiteit Leuven (KU Leuven); The Global Lottery Monitoring System (GLMS).

Supporting Partner: FIFPRO



As a result of this project, European LEAs and JAs will be able to better cooperate, investigate more sport corruption cases and, by consequence, more effectively bring and prove them at criminal courts.

The final beneficiaries of the project 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 general public trust; as well as sport-financing and government revenues throughout the European Union, and – outside the scope of this project – beyond.

Moreover, the concept has been implemented, so far, through two projects since 2019, and is projected to be consolidated as a permanent project between the stakeholders. IntegriSport E+ (2019-2020), being the first project, brought together police authorities and their national platforms from 7 European countries (Slovakia, Portugal, Hungary, Lithuania, Finland, Cyprus and the Netherlands).

This Cyprus Curriculum is one of the outcomes of the project that supports the overall goal of combatting sport competition manipulation.

1.2. Curriculum Purpose and Methodology

The tailored curriculums for each partner country, delivered by CSCF, are part of the Implementation Phase of the project, and they form the basis of the tailored Awareness Raising Practical Session (see 1.3) based on the research performed in the previous phase of the project. These curriculums contain all the aspects, *modus operandi*, legal and policy issues that should be used in sport manipulation related investigations. It covers the presentations of all lecturers, as well as case studies and other materials.

This Cyprus curriculum is designed as a pedagogical material in order to fully understand the phenomenon of sport competition manipulation that impacts Sports in Cyprus. This curriculum aims to explain all relevant aspects of the situation. As a result of this curriculum, the reader will better understand the current situation as well as how to investigate, prosecute and judge criminal activities in sport manipulation more effectively.

The pedagogical materials will be delivered electronically (PowerPoint or Prezi), as well as a slide deck. The knowledge contained in this tailored curriculum contributes to sustainability of the IntegriSport project because it can be the foundation for training sessions in the future of sports in Cyprus. As such, CSCF will continue to combat sport competition manipulation in Cyprus for the foreseeable future.

This curriculum is the result of:

- Desk research (Intellectual Output 1),
- Fact finding missions (Intellectual Output 2)
- Evaluation through questionnaires (Intellectual Output 3)
- The knowledge of the international experts on match fixing and related crimes

Based on these inputs, the expert and future lecturers are responsible for developing their own materials, in consultation with the project leading expert, as well as the quality measures established. All of these activities will make this output tailor-made to the needs of the Partner Countries.

1.3. About the Awareness Raising Practical Session in Cyprus

This session, hosted in Nicosia, Cyprus and chaired by CSCF, was intended to facilitate cooperation at national level (by inviting representatives of local sport and betting organization) and international level (by inviting peers from other countries to share their best practices and learn from each other), focusing on improving the situation with law enforcement in their fight against match-fixing. The rest of the information comes from research findings on cases and risk factors that exist in Cyprus related to match-fixing. The Awareness Raising Practical Sessions has the goals of sharing knowledge on the project topics:

- Sport integrity
- Sport betting
- Virtual currencies
- Related criminal offences (corruption, fraud, money laundering)
- Policy making and National and international co-operation

Moreover, each event has a “peer-to-peer meeting” and “operational expertise service” that are offered to representatives of counterpart law enforcement agencies or judicial authorities in order to build on their investigative and prosecuting techniques regarding sport manipulation cases. The service is offered by CSCF whenever it is needed and requested.

On April 5th and 6th of 2022 CSCF, in coordination with the hosting country partner, the Cyprus Police, executed an unprecedented local event (ARPS) for law enforcement and prosecutors in the fight against the phenomenon of sports manipulation. The Cyprus Police and Ethics Committee is responsible for combatting sports manipulation and other criminal activities related to sport.

The session was supported by presentations from the project partners as well as local and international experts. This session was chaired by CSCF and it included speakers from the Cyprus Police, INTERPOL, Spanish General Judicial Police, the Global Lottery Monitoring System (GLMS) and CSCF experts, as well as special participation from FIFPRO as the project’s supporting partner.

Moreover, representatives from local guest organisations also actively took part in the event by giving insights into the situation in the country, including the Cyprus Football Association, Cypriot former and current professional footballers, and Cypriot football coaches.

The session made a vital contribution to the developments in Cyprus with a peer-to-peer session of several national stakeholders, including prosecutors from Hungary, as well as international expertise from Interpol, former Europol sports corruption unit intelligence officer Norbert Rubicsek, and GLMS, in an exchange of best practices.

This session was the **one of six editions** that has been taken place in the six countries of the project in the EU, namely **Estonia, Finland, Sweden, Cyprus, Malta, and Georgia.**

The IntegriSport Next public international closing conference will take place on November 4, 2022.

The agenda for the ARPS Cyprus is below. In order to obtain the presentations in more detail, please contact The Cyprus Police (cangeli@police.gov.cy) or CSCF (integrisportnext.admin@cscfsport.com).

ARPS Day 1 Presentations

Welcoming speech & Opening of the Awareness Raising Practical Session Speakers:

Mrs Chryso Angeli – *Deputy Director*, Mr Stylianos Papatheodorou - *Chief of Cyprus Police*

- Mr Norbert Rubicsek - *Director - CSCF Foundation for Sport Integrity*
- Mr Charis Poyiatzis – *President National Ethics Committee*
- Mrs Mary Papamiltiadous - *Cyprus Sports Organization*
- Mr Savvas Angelides – *Deputy Attorney General*
- Mr Claudio Marinelli (Online) *INTERPOL - Criminal Intelligence Officer & Project Manager, Integrity in Sport*
- Sophie Kwasny & Nicolas Sayde (Online video message) - *Council of Europe*

Project Introduction & Research findings IntegriSport Next E+ Speaker:

Mr. Carlos Gutierrez IntegriSport Next Coordinator - *CSCF Foundation for Sport Integrity*

Fixing the Risks: Understanding Event Manipulation (in English with interpretation in Greek)

Introduction on the subject of sport manipulation, international policy, typology, the vital role of law enforcement within that process and exploring the lessons learned from international stakeholders in the fight to protect against this phenomenon.

Active learning exercise about National and International co-operation and policy making (one-page summary with learnings)

Speaker: Lorraine Pearman

IntegriSport Next E+ Expert - CSCF Foundation for Sport Integrity

How match-fixing in football is affecting players and how can we protect players? A presentation from a players (union) perspective (in English with interpretation in Greek)

Speakers (Hybrid): Frederique Winia & Loic Alves

Director Member Services & Senior Legal Counsel – FIFPRO

The perspective of a local sports organization on how it works to prevent and investigate match-fixing (in Greek with interpretation in English)

A review of the work of a local sports organization against manipulation in sports. What the structure looks like, what regulations exist, cooperation with other stakeholders and what are the biggest challenges and opportunities.

Speaker: Michalis Angelides
Cyprus Football Association, Integrity Officer

Footballers' perspective on Match Fixing: Views and opinions - real life experiences and the ethics behind playing professional football (in Greek with interpretation in English)

Moderator of discussion:

Mr Nectarios Alexandrou – ex professional player, Motivational speaker, and Coach LFC

Panel discussion with professional football players

- Mr Savvas Poursaitides – Professional Football Coach of Category A Teams
- Mr Vangelis Kyriakou – Professional football player Olympiakos Nicosia FC – Team Leader
- Mr Neofytos Michael – Professional goalkeeper APOEL Nicosia FC - National Goalkeeper
- Mr Andreas Christodoulou – Professional football player ETHNIKOS AHNAS
- Mr Ioannis Taralides – Ex- Professional Football Player
- Mrs Andria Kirkini – Ex-International football player in women teams

Presentation on sport betting and sport manipulation – betting monitoring and policy making at the international level (in English with interpretation in Greek)

Sports betting and how it can be abused for purposes of sports manipulations, including the multi-stakeholder approach, work at the international level, case studies and the importance of betting monitoring in prevention, detection, and sanctioning

Active learning exercise about National and International co-operation and policy making (one-page summary with learnings)

Speakers (hybrid):

Cassandra Fernandes (In-person) Legal and Projects manager

Chris Yaakoubian (Online) & Benoit Borsato (Online) *Monitoring and Analysis Coordinators - North American hub*

Global Lottery Monitoring System (GLMS)

ARPS Day 2 Presentations

Manipulation of sports competitions using virtual currencies and the dark web (in English with interpretation in Greek)

The spread of virtual currencies has also had an impact on sports manipulation. Young e-sports players, betting portals on the dark web, and the pseudo-anonymity of cryptocurrencies are threats that should be taken seriously.

Active learning exercise about Virtual Currencies (one-page summary with learnings)

Speaker (Online): Gergely Vesszős

IntegriSport Next E+ Expert - CSCF Foundation for Sport Integrity

Criminal Offences in relation with sports manipulation (in Greek with interpretation in English)

Speakers: *Cyprus Police*

Superintendent B', Andreas Anastasiades

Deputy Director of Combating Crime Department

Sergeant Lakis Andreou

Head of Division for illegal gambling/sports manipulation

Constable Gregoris Agapiou

Examples on investigating on sport manipulation, good practices, bad practices, hurdles, and solutions (in English with interpretation in Greek)

Speaker (Online): Claudio Marinelli

INTERPOL - Criminal Intelligence Officer & Project Manager, Integrity in Sport

Presentation of a case of sport manipulation outside Cyprus (in English with interpretation in Greek)

Speaker (Online): Inspector Oscar Perez Peca

Head in 1st group in CENPIDA, Spanish General Judicial Police

Spanish representant in Interpol Match Fixing Task Force (IMTF)

Spanish representant in AP Corruption (Europol)

Peer-to-peer meeting: Case studies – Group session - Podium discussion (in Greek and English with interpretation in both languages)

Representatives from:

- Representative from Cyprus Police (LEA)
- Representative from Cyprus Prosecutor
- INTERPOL (Online): Claudio Marinelli - Criminal Intelligence Officer & Project Manager, Integrity in Sport
- Representative from the Cyprus FA and Football Union

- Spanish General Judicial Police (On-line): Oscar Perez Peca, Head in 1st group in CENPIDA, Spanish General Judicial Police
- Global Lottery Monitoring System (GLMS): *Cassandra Fernandes, Legal and Projects manager; Chris Yaakoubian (Online) Monitoring and Analysis Coordinators - North American hub*
- CSCF Foundation for Sport Integrity: *Norbert Rubicsek - IntegriSport Next E+ Manager & Director* (Moderator of the session)

Examples of investigating sport manipulation, good practices, bad practices, hurdles, and solutions



SECTION 2

UNDERSTANDING THE ISSUE
OF SPORTS MANIPULATION



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2. Understanding the issue of sports manipulation

2.1. Relevant Concepts and Definitions

Sports Competition Manipulation aka Match-Fixing

Intentional arrangement, act or omission aimed at an improper alteration of the result or 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 others

This can refer to events manipulated for financial gain, or for sporting gain. In addition, the manipulation can refer to the entire contest, or merely elements or moments in the contest

"Fixed"

Refers to a match or event in which match-fixing/competition manipulation occurred

Whistleblowing

Person who reveals information about activity within an organization that is deemed illegal, immoral, unsafe, or fraudulent. In the case of match-fixing, a whistleblower is any person who reports information about competition manipulation to relevant authorities

Fraud Detection/Monitoring System

A betting-monitoring system that compares actual odds of a match to predicted odds, where statistically significant unexpected deviations in the odds are a reflection of the integrity of the match. A 'fixed' event will generally see much higher betting volume and unexpected odds, and these odds will favor the individuals fixing the game

Esports

Video or computer games played competitively

Sport Fraud

Wrongful or criminal deception intended to result in financial or personal gain. In the context of sport, competition manipulation/match-fixing is classified as sport fraud in some criminal codes

Omertà

A code of silence, particularly when questioned by authorities or outsiders. Involves ignoring illegal activities of others.

2.2. Sports Competition Manipulation: An Overview

At the forefront of sport corruption is competition manipulation, or match-fixing, famously labelled by former International Olympic Committee president Jacques Rogge as the greatest modern threat to sport integrity given its global, complex, and persistent nature (Carpenter, 2012). Below is the official definition of sport competition manipulation as set out in the Macolin Convention

“Manipulation of sports competitions” means an intentional arrangement, act or omission aimed at an improper alteration of the result or 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.

In simplistic terms it means something that impacts the natural course of an event.

The term ‘match fixing’ is often used to describe event manipulation. However, match fixing is usually assumed to be linked to betting corruption, organised crime and playing to lose; it is true that we do see media reports about this type of manipulation, from across the globe, on a daily basis.

However, an event can be manipulated in many different ways, for many different reasons. For example, events can be manipulated to achieve a sporting goal, to qualify for a competition or to avoid relegation

2.3. Why is Sport Competition Manipulation a Problem?

The increased popularity of sport and the associated commercial gains from the betting market creates a tempting target for criminals seeking profit. The high profits and low risks involved with manipulating contests means that competition manipulation now exists as an inescapable aspect of sport’s reality (Huggins, 2018; Vamplew, 2018). Nowadays, sport competition manipulation scandals make headlines, but secrecy, cultures of silence, and fear of reporting continue to mask the full extent of the problem.

Sport competition 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 (Serby, 2012). The persistent link to criminal activities threatens the commercial viability of the economic product of sport (Ricci, Scafarto, & Marsigalia, 2016; Holden & Rodenberg, 2015). The economic damages from sport competition

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 (Boeri & Severgnini, 2013; Maennig, 2005; Huggins, 2018; Serby, 2012; Van Der Hoeven, De Waegeneer, Constandt, & Willem, 2019; Chappelet, 2015).

Headline catching consequences from sport competition manipulation showcase this damage. Football leagues in Thailand, Malaysia, and Vietnam were entirely disassembled due to problems with sport competition manipulation (Holden & Rodenberg, 2016). Similarly, volleyball leagues across Asia collapsed amidst betting scandals. Sponsors and fans both equally shunned the discredited competitions (Forrest, 2017). Betting companies have a vested interest in negating the narrative that competition manipulation is widespread in sport as well. Failure to do so means the profitable revenue stream of sport betting is under

serious threat (Vamplew, 2018). Both the betting industry and the sport industry benefit financially from sport free of competition manipulation, which means they should be equally motivated to address the problem. They both value

fairness and uncertainty of outcome, not for its own sake, but because of the utility it holds for ensuring financial gains from sports betting (Tak, Sam, & Jackson, 2016).

2.4. The Need for Law Enforcement

Sport-manipulation is often viewed as a sport-disciplinary only issue and one that is the responsibility of athletic organizations. In reality however, the possibility of instantaneous, online, cross-border betting on nearly every major or lesser known sport-event creates an enormous temptation for organized, international criminal organizations to exploit the weaknesses of the Law Enforcement Agencies (LEAs) and Judicial Authorities (JA) capabilities and corrupt the fair competition of sport. These criminals want to manipulate the betting market and fix matches in order to launder money and secure financial gain (Van Der Hoeven, et al 2019). Significant strides have been in discovering incidents of match-fixing, which has largely overcome denial of the problem.

The challenge now is how to support LEAs and JAs because they can apprehend and punish criminal instigators outside of sport's jurisdiction (Holden & Rodenberg, 2015; Kihl, Ndiaye, & Fink, 2018; Rebeggiani, 2015; Rodenberg, Sackmann, & Groer, 2016). LEAs and JAs must bear a measure of responsibility because they hold the power to prosecute criminals responsible for fixes, a power that sport governing bodies' lack (Chappelet, 2015; Serby, 2015).

Unfortunately, the priority for match-fixing is low amongst LEAs for many reasons. Firstly, there is a general lack of awareness. Collecting evidence is also difficult. Those involved are afraid or

unwilling to testify, the crime crosses national boundaries, and resources are limited. Additionally, securing prosecutions remains frustratingly elusive even with seemingly clear cases. Promising cases are dropped due to insufficient evidence, lack of witnesses, and lengthy investigations. The most common results of match-fixing incidents are sporting sanctions for the individual(s) directly involved, rather than a criminal conviction for those same individuals or the criminals organizing the illicit operations.

The project organized by CSCF provides research-based, custom-tailored line of learning sessions, peer-to-peer discussions amongst LEAs and JAs in various EU countries, and expertise for supporting LEAs and JAs in their operational and strategic work. With the in-depth knowledge provided through the IntegriSport Next project, prosecutors and law enforcement officers will be better equipped to prove offences related to match-fixing cases in court, and able to co-operate more accurately with other stakeholders from the sport and betting world at national and international level. Furthermore, judges will also be able to knowledgeably address the evidence of this sophisticated and complex criminal activity. LEAS will also be given contact points in order to exchange ideas with their partner organizations regarding investigative techniques and receive special expertise in their operational or strategic cases. In doing this, the project

builds a national and international cooperation network for LEAs and JAs in order to better cooperate, investigate

more sport corruption cases and, by consequence, more effectively prosecute cases in criminal courts.

2.5. Project Topics

2.5.1. Sport integrity

Manifestation of the ethics and values which promote confidence in sports, including positive conduct by its members and community. In the context of this project, protecting the integrity of sport is synonymous with protecting the integrity of fair uncorrupted competition. Sport competition manipulation is a sport integrity threat because it corrupts the unscripted nature of fair competition in sport.

2.5.2. Sport betting

Activity of predicting sports results and placing wagers on the outcome. Sports betting is hugely popular with many transactions conducted across a variety of platforms and on a variety of sports (De Sanctis, 2014). Football, horse-racing, tennis, golf, cricket, and a host of other sports are now synonymous with betting. Technological changes resulted in globalized, easily accessible, and extremely popular online betting markets (Vamplew, 2018). Derivative bets relating to some component of the final score, such as the winner of the first quarter, are common. Similarly, side bets regarding statistics such as the numbers of goals scored, or the number of yellow cards are also popular. Gamblers can bet on almost

any element of a contest, the bets can be placed before and during the event, and bets can be spread across multiple contests at the same time or over a period of time. Sport betting is global as a result of technology, which allows global online betting options that can bypass national legislation that restricts local betting.

2.5.3. Virtual currencies

Digital representations of value that exist only in electronic form. In sport betting they are now being used in order to place bets, and they are a popular tool for those wishing to remain anonymous with their betting. Moreover, virtual currencies 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 (Kerr, 2018). This is ideal for criminal activity. Criminals can use virtual currencies to place bets associated with sport competition manipulation in order to avoid detection by the monitoring services that betting operators use. Virtual currencies pose a novel and extreme risk for sport competition manipulation.

2.5.4. Related criminal offences (corruption, fraud, money laundering)

The legislation that regulates sport competition manipulation varies across countries. Sport competition manipulation violates civil and criminal legal codes relating to fraud, bribery, money laundering, and corruption in some countries. As a result, there exists a major gap in the legislative framework to

deal with sport competition manipulation which causes problems for effectively fighting the issue (Holden & Rodenberg, 2016; Rodenberg, Sackmann, & Groer, 2016; Moriconi & Almeida, 2018). The Macolin Convention has pushed for EU Member States to include match-fixing as a specific criminal offence in their legislation (Renita, 2019). Research suggests that countries with specialized legislation related to sports competition manipulation investigate more cases and

have more success with prosecuting individuals (Petropoulos, 2018; Hallman et al., 2017). A specified criminal offence would be a stronger deterrent and give more options regarding incidents of sport competition manipulation (Hallman et al., 2017).

2.5.5. Policy making and national/international co-operation

In order to combat sports competition manipulation effectively, policy making must promote national and international

cooperation. Fighting manipulation of sport events requires communication and coordination from the local betting industry, judicial authorities, law enforcement, sport organizations, ethics committees, and sport actors. In addition, there is a need for international communication and cooperation. International cooperation needs to be a priority because the crime is transnational, and so training on international mechanisms regarding cross-border crimes should be a priority for LEAs and JAs of countries where sport competition manipulation occurs.



SECTION 3

UNDERSTANDING THE CURRENT
SITUATION IN CYPRUS



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3. Understanding the Current Situation in Cyprus

3.1. Background

Cyprus has been labelled the central hub of European sport competition manipulation (Kartakoullis & Theophanous, 2009). The types of manipulations are betting-related, less so non-betting sport-related, where the principal motivation is to make money or launder money (FFM Cyprus, 2021). 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 (FFM Cyprus, 2021). It is noteworthy that the manipulations entail threats to life and physical harm. Allegations of institutional corruption have been made regularly for the last decade in Cyprus.

In order to tackle sports manipulation, President Nicos Anastasiades announced

a range of important changes over the last two years to target corruption in general, and sport corruption in particular ("Cyprus Unveils Anti-Corruption Steps", 2021; Theodoulou, 2020). 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.

3.2. Relevant National Stakeholders

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

- Appointed Directly by Council of Ministers, the CESS functions as National Platform.
- Has authority to investigate unethical behavior of people in sports ("Cyprus to Draft", 2020). 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.
- They work closely with the police and national betting authority, who are required to notify the Committee in case of suspicious events (FFM Cyprus, 2021).

3.2.2 *Cyprus Football Association (CFA)*

<https://www.cfa.com.cy/En/home>

- Governing body of football in Cyprus
- Cypriot football officials have been accused of denying the existence of the problem of sport manipulation (Kassimeris, 2018).
- Punishments against Sport Manipulation (Angeli, 2021): 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.

3.2.3 Cyprus Sports Organization (CSO)

<https://cyprussports.org/gr/>

- 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.

3.2.4 Ministry of Justice

http://www.mjpo.gov.cy/mjpo/mjpo.nsf/index_en/index_en?OpenDocument

- The Ministry of Justice is heavily involved in Cypriot sports given the numerous recent scandals of sport competition manipulation.
- The Justice Minister George Savvides has made statements bemoaning the current situation and is trying to make changes to combat corruption in sport (Psyllides, 2016). For example, all second division games will be recorded and monitored, every incident of sport competition manipulation will be investigated, and they have reiterated that the government will try to better protect whistle-blowers (Theodoulou, 2020; Psyllides, 2016).

3.2.5 Cyprus Police

- The Cyprus police operates under the Ministry of Justice
- Their duties and responsibilities are outlined in Police Law (N.73 (1)) of 2004.
- Criminalizing sport competition manipulation has 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 (FFM Cyprus, 2021).
- They are helping develop the National Platform and preparing for eventual ratification with the Macolin Convention (FFM Cyprus, 2021)
- 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 competition manipulation consists of 6 members ("Cyprus to Draft", 2020).
- 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 (FFM Cyprus, 2021):
 - Confiscation of mobile phones, computers, and personal documents;
 - 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.

3.2.6 National Betting Authority (NBA)

<https://nba.gov.cy/en/>

- The National Betting Authority consists of a President and six (6) Members. These include representatives from the Accountant General's Office of the Republic, the

Ministry of Finance, the Ministry of Justice and Public Order and three individuals of good repute and honesty with specialised knowledge consistent with the Authority's powers. All are appointed by the Council of Ministers (Angeli, 2021)

- Both land-based and online sports betting are legal in Cyprus and regulated by the National Betting Authority according to the 2012 Betting Act. Betting operators who wish to provide sports betting, can apply for two different licenses;
 - Class A for traditional land-based betting
 - Class B for online sports betting (which a business can only successfully obtain once they possess a land-based license or are partnered with a local company).
- Licensees will remove events from their sportsbooks if there are valid concerns that the event is, or might be, manipulated (FFM Cyprus, 2021).
 - These alerts come from inhouse analysis or information received from relevant stake-holders (CFA/licensed operators).
- Monitors betting transactions conducted by their licensed operators, and they are incorporating a new betting monitoring system to automatically flag suspicious activity
 - If they receive a notification from the police of a suspected fixed match, they will send that information to their operators to stop offering bets on that match.
- Working on enhancing their relationship with the Ethics Committee, and they are in the process of establishing their own ethics/integrity unit (FFM Cyprus, 2021).
- Unit for Combating Money Laundering Offences (section 54).
 - Representatives include the Attorney General, Chief of Police, Director of the Department of Customs and Excise, appointed by Attorney General, Chief of Police, and Director of Department of Customs respectively (Psyllides, 2021).
 - Members will be investigators, and they will operate independently and autonomously with the goal of gathering, evaluating, analyzing suspicious transactions submitted by entities or persons in relation to money laundering offences.
 - This unit shares information with police and public authorities and with corresponding units abroad (Psyllides, 2021). They can carry out investigations and in doing so they have the power to monitor bank accounts given reasonable suspicion.

3.3. Risk Factors

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

- 1) Underpaid referees
- 2) Underpaid players
- 3) Financial fragility of clubs/teams
- 4) End of season matches
- 5) Salary delays for players, referees, club officials
- 6) Omert /Fear of reporting incidents
- 7) Less attention on competition (media and fans)
- 8) Difficulty of separating gift-giving and bribery
- 9) Failure to adequately protect player anonymity
- 10) Foreign players in league
- 11) Lack of betting restrictions for high-risk games (youth, amateur, lower division, and end of season matches)
- 12) E-sports betting popularity and cryptocurrencies allowed in sport betting

13) 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 competition manipulation (Tak, 2017; Van Der Hoeven, De Waegeneer, Constandt, & Willem, 2019). The confidence in authorities from the public and sport actors is very 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 ("Omonia Boss Blasts", 2020). 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 (Assiotis & Krambia-Kabardis, 2016).

Secondly, the Cyprus football league, which is the main sport at risk for sport competition manipulation, is mired in financial difficulties. Players and referees are neither paid well nor on time, and commercial investment is low (FFM Cyprus 2021, Angeli, 2021; Kartakoullis & Theophanous, 2009). Allegedly, sport competition manipulation became a way of boosting funds for the clubs and paying player's salaries (Psyllides, 2016; Smith, 2016). The example of 1 Euro contracts in Cyprus are a clear risk factor for players feeling desperate in terms of their financial situation (FFM Cyprus, 2021). Clearly, in such situations the players do not have a proper contractual basis for their employment. It is not uncommon 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 (Smith, 2016).

Thirdly, the structure of the Cypriot football league is problematic. Competitive balance in the league is almost nonexistent and oversight is minimal (Kartakoullis & Theophanous, 2009). The top clubs in the first division are separated categorically from the rest of the clubs in strength and size (Kartakoullis & Theophanous, 2009). 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 (Stucan & Bird, 2018).

Finally, fears of repercussion from reporting is a serious problem in Cyprus (Smith, 2016; Kassimeris, 2018). 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 (Assiotis & Krambia-Kabardis, 2016; Angeli, 2021).

3.4. Cases

Since 2011 over 85 "notices" have been received by Cyprus Football Federation. UEFA informed CFA of 59 instances of suspicious betting in 2015-16 season alone. A new law was eventually passed in 2017 to deal with sports corruption, which has resulted in 90 notices. 5 cases were sent to the Attorney General Office with suggestions for criminal prosecution, with 1 of these cases leading to trial where the accused was convicted. 1 case was withdrawn and the remaining 3 are still on trial at the time of writing. The discovery of these incidents typically relies on UEFA's Sportradars Fraud Detection System (FDS) monitoring their betting market and sometimes anonymous reporting through the Red Button App. If the alert comes from the FDS, 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. Below are examples of recent cases in Cyprus:

3.4.1. El Confidential Report

Gibbs, Erik. "Possible Spain-Cyprus Match-Fixing Link Uncovered." *CalvinAyre*, 18 Feb. 2020.<https://calvinayre.com/2020/02/18/sports/possible-spain-cyprus-match-fixing-link-uncovered/>. Accessed 15 July 2021.

"Cyprus to Draft Strict New Legislations to Fight Football Corruption." *Xinhuanet*, 27 Feb. 2020.http://www.xinhuanet.com/english/2020-02/27/c_138822005.htm. Accessed 15 July 2021.

3.4.2. Various Bomb Attacks

"Bomb Attack on Car of Cypriot 2nd Division Team's VP." *AP News*, 24 Jan. 2020.<https://apnews.com/article/c435559d22dd2cd485a369847b3ec53f>. Accessed 15 July 2021.

Smith, Helena. "Car Bombs, Corruption and Illegal Betting – How Football in Cyprus Spiraled Out of Control." *The Guardian*, 6 Sep. 2016.
<https://www.theguardian.com/football/blog/2016/sep/06/bomb-attacks-and-boycotts-how-football-corruption-in-cyprus-turned-nasty>. Accessed 15 July 2021.

Kartakoullis, N., Theophanous, A. (2009). Important parameters of the football industry in Cyprus: Challenges and opportunities. *The Sport Journal*, 12(1543-9518)

3.4.3. 2020 Incidents

"Fresh Allegations of Match Fixing." *CyprusMail*, 9 Nov. 2020,
<https://cyprus-mail.com/2020/11/09/fresh-allegations-of-match-fixing/>. Accessed 15 July 2021

"Cyprus Sports Ethics Committee Investigates Possible Match-Fixing". *CyprusMail*, 21 Sep. 2020, <https://cyprus-mail.com/2020/09/21/cyprus-sports-ethics-committee-investigates-possible-match-fixing/>. Accessed 15 July 2021.

Shkurko, Jonathan. "Red Button App Effective While Protecting Players' Anonymity, Says Pasp President." *CyprusMail*, 13 Feb. 2020, <https://cyprus-mail.com/2020/02/13/red-button-app-effective-while-protecting-players-anonymity-says-pasp-president/>. Accessed 15 July 2021.

Psyllides, George. "Match-Fixing Still Rife, Says Justice Minister." *CyprusMail*, 3 June 2016, <https://cyprus-mail.com/2016/06/03/match-fixing-still-ripe-says-justice-minister/>. Accessed 15 July 2021.

3.4.4. Case of Referee Marios Panayi

Psyllides, George. "Match-Fixing Still Rife, Says Justice Minister." *CyprusMail*, 3 June 2016, <https://cyprus-mail.com/2016/06/03/match-fixing-still-ripe-says-justice-minister/>. Accessed 15 July 2021.

3.4.5. 2018 Referee Scandal

Stucan, Costin., & Bird, Michael. "The Cypriot Deception." *The Black Sea*, 19 Nov. 2018, <https://theblacksea.eu/stories/football-leaks/cypriot-deception/>. Accessed 15 July 2021.

3.4.6. Cricket Case: Limassol Gladiators 2020

Grunshaw, Tom. "Limassol Gladiators Excluded from European Cricket Series Cyprus in match Fixing Probe." *Emerging Cricket*, 23 July 2020, <https://emergingcricket.com/news/limassol-gladiators-excluded-from-european-cricket-series-cyprus-in-match-fixing-probe/>. Accessed 15 July 2021.

3.5 Whistleblowing and Reporting Channels

Under Cypriot Law, 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

Since February 2020, Cyprus have used the Red Button Application for anonymous reporting of sport competition manipulation (Shkurko, 2020). More than 20 reports have been filed, which has led to two arrests. One of these was from the match between Othellos and Ayia Napa that led to the arrest of Ayia Napa Chairman, former referee and player agent Demetris Masias, and referee Andreas Constantinou on February 8, 2020 (Shkurko, 2020). Reports from the Red Button App go directly to Finland, and players can prove plausible deniability by showing the code they used to file that specific complaint. However, concerns regarding anonymity protecting if the case goes to court still remain (FFM Cyprus, 2021)

3.6. Regulatory Legislation

In 2020, Cyprus set up legislative committee to draft new legislation to fight football corruption ("Cyprus to Draft", 2020). 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 an alarming amount of reports of sport competition manipulation as evidenced in section 3.1.2., authorities frequently fail to identify suspects and secure convictions. Allegedly, any time authorities approach a breakthrough, suspects are able to evade prosecution through alleged political protection (Psyllides, 2021).

The Law on Combating Manipulation of Sporting Events of 2017 (180(I)/2017). 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 and the relevant articles are listed below.

- Manipulation of a sporting event, Article 11.
- Bribery for altering the result of a sporting event, Article 12.
- Prohibition of betting by athletes and sports agents, Article 13.
- Sport Agents and Representatives Article 14.
- Providing Confidential Information, Article 15.
- Obligation to report / provide information, Article 16.
- Providing false or misleading information, Article 17.

Gambling Law. A large percentage of the GDP that comes out of the football industry in Cyprus is from the betting industry (Kartakoullis & Theophanous, 2009). At the time Kartakoullis & Theophanous (2009) conducted their study, 2% of that net revenue from betting is paid to Cyprus Sports Organization, with 1.5% to football. There exists a national regulatory framework from 2018 for the suppression and prevention of money laundering, as well as a directive from 2021 on the prevention and suppression of money laundering. The links can be found below:

[http://www.law.gov.cy/Law/MOKAS/MOKAS.nsf/All/8D5B6DF6DC5D5815C2257BE1002A2848/\\$file/AML%20Law%20Consolidated%20up%20to%2013\(I\)%202018.pdf](http://www.law.gov.cy/Law/MOKAS/MOKAS.nsf/All/8D5B6DF6DC5D5815C2257BE1002A2848/$file/AML%20Law%20Consolidated%20up%20to%2013(I)%202018.pdf)

Article 27: It is a criminal offence to commit money laundering through gambling and also criminal offence if they do not disclose information to Unit as soon as it is reasonably practicable after it comes to their attention. Punishment is imprisonment up to two years and fine of 5,000 euros, or both.

<https://nba.gov.cy/wp-content/uploads/DIR.15.2021-EN.pdf>

Gambling Law Part VI Article 60: Online bookmakers have strict controls for player registration where they have to provide details related to their identity and home address. The problem remains, however, that these controls do not account for offshore illegal gambling. According to Article 70, violating gambling law can result in misdemeanor and they can be imprisoned up to 2 years and a fine up to 170,000 euros, or both. If the violation involves money laundering, they will be found guilty of a criminal offence and Article 27 of Law on Prevention and Suppression of Money Laundering shall apply.



SECTION 4

MAIN ISSUES AND
POSSIBLE RESPONSES



FOUNDATION FOR
SPORT INTEGRITY

4. Main Issues and Possible Responses

The desk research, the ARPS, and the peer-to-peer meetings were chaired and conducted by CSCF and they highlighted specific issues in Cyprus regarding the **discovery, investigation, prosecution, and prevention** of sport competition manipulation. Below are the most relevant areas that need to be addressed in order to improve the situation in Cyprus.

4.1 Education

Issue(s)

- Education sessions are limited if only players are in attendance
- Education focuses too much on football
- Education sessions content needs to be improved in order for attendees to better understand the risk factors and solution strategies that exist in the country's context

Possible Response(s)

- Education sessions should be mandatory for all club officials and committee members
- The target audiences for education sessions should include these stakeholders involved in or implicated by sports competition manipulation. Every stakeholder should understand what sport competition manipulation is, how to identify it, how it is discovered, and what their role is in relation to combatting the phenomenon.
- Education sessions should identify the risk factors mentioned in this curriculum, with the goal of teaching the audience how they can address risk factors in their own domain.
- Education programs should include athlete-models who adopt an appropriate behavior in the context of sport
- Case studies of Cyprus incidents of sport manipulation should be in the educational program
- Punishments for those discovered of wrongdoing should also be clear to the participants of the education sessions, as well as a realistic view of any protections offered to those whistleblowers come forward with information.
- Athletes, coaches, and referees should be taught coping skills to resist match-fixing by learning
 - how to recognize the phenomenon
 - where the relevant resources are to report the wrongdoing
 - how to properly report after being approached or witnessing an incident.
- Other sports besides football should be discussed, given there have been alerts of sport manipulation in basketball as well as other Cypriot sports (FFM Cyprus, 2021)
- The people delivering the education programs should be properly chosen. Ideally, these individuals should be qualified professionals in the field of ethics and integrity in sport. At the very least, they should have a background knowledge of the phenomenon.
 - This selection of the education team could be the responsibility of the national platform or whichever organization is determined to be the point of contact for sport integrity concerns in Cyprus.

- The coordination of these education programs should be standardized across sports and localities. As such, it is easier to evaluate and control the material being distributed within the cultural context.

4.2 Whistleblowing

Issue(s)

- Anonymity protection is low in cases of sport manipulation. Cyprus is a small nation and people are easily found out and/or exposed, making it difficult to protect whistleblowers.
 - These whistleblowers lack protection at a legislative level
- Players fear reporting due to repercussions. The cases described above highlight that physical threats and violence are an issue in Cyprus for whistleblowers. Other individuals in the world of football in Cyprus have expressed fear over repercussions from the regulatory bodies themselves.

Possible Response(s)

- Make the whistleblowing channels centralized through the National Platform
- Improve anonymity protection, or protection after they report, either through sporting regulation or through legislation
 - Protection at a legislative level is being addressed at the time of writing with proposals for incorporating legislative protections to preserve anonymity of reporting.
- Provide incentives for whistleblowing, such as criminal exemptions even if they were involved
- An ombudsperson in sport would be useful against sport competition manipulation (Grech, 2018a).
 - Could investigate claims of sport competition manipulation as a private citizen complaint.
 - Could safeguard the individual who files the complaint

4.3 Investigations

Issue(s)

- The most significant barrier to investigation is finding enough evidence to support a case in the court of law. “Following the money” is a useful strategy, but it is not always feasible given the difficulty of discovering who is the originator of the manipulation behind the scenes. This is compounded by the fact that police were not allowed to use wiretapping techniques in Cyprus. The new legislation allows for this technique.
- It remains difficult to obtain written statements because witnesses are afraid to testify before court, which makes it all the more difficult to gather evidence for a trial. The Red Button App helps to discover incidents, but criminal prosecutions will continue to be an issue for Cyprus if they cannot protect anonymity.

Possible Response(s)

- The sport organizations lack many investigative powers, in order for a proper investigation to happen the police must be involved

- Adopt strategies from financial crime investigations.
 - Bank control permits would offer better controls over financial transactions between criminal parties to prevent the money laundering that occurs in sport competition manipulation.
 - A financial monitoring service department through law enforcement, could tracking the moving of money of suspicious persons.
- 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.
- Law enforcement should seek different targets compared to the disciplinary sanctions issued by sports bodies towards sport actors
 - Even if referees and players involved can be sanctioned or convicted swiftly, the formal law enforcement investigations of off-field criminals need to be a priority
- Law enforcement and prosecutors may benefit from a greater understanding of the powers and potentially useful evidence in the possession of other relevant stakeholders (i.e. account details of bettors that can be provided by relevant betting organizations)
- Tele-supervision involving the seizure of 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, in accordance with its domestic law
 - Surveillance such as wiretapping and following suspects has already proven to be useful in cases that occurred in Finland and Georgia.

4.4 Prosecution

Issue(s)

- Merely having solid legislation does not ensure successful prosecutions. Events gathered and testimonies taken will determine how successful a case will be at court.
- Cases in Cyprus take too long from the time they are prosecuted in court to the time there is a final decision. During that time, a sport actor who reported an incident may not feel as comfortable going to court.

Possible Response(s)

- Special consent from the general attorney or other relevant authorities could be useful to make the case progress more efficiently
- The efforts of the match-fixing unit in Cyprus Police may struggle in the long run with constant rotation of the personnel in the unit itself which greatly hinders attempts at carrying out investigations and traceability of prior work. This unit has the potential to generate higher conviction rates.
- Improving the method of collecting evidence, as proposed by point 4.3, could be useful for cases leading to prosecution.

4.5. Sanctions

Issue(s)

- The sanctions and punishments that exist for sport competition vary and are arguably too lenient.
- Sanctions are inconsistent and rarely enforced

Possible Response(s)

- Harsher punishments are recommended in a variety of contexts
- Clubs should be held responsible through vicarious liability, as already applies in Malta, in order to incentivize clubs to make more of an effort to monitor and police what goes on under their jurisdiction.
 - If the financial sanctions are strong enough, or if there is a threat of points being dropped from the league, it could lead to a change of culture in sport clubs where dismissing incidents or reports becomes too risky to allow.
- Sport authorities, including those responsible for league competitions, should consider more severe punishments for players, coaches, agents, and officials involved in sport competition manipulation.
 - Enforce prohibition of sport actors banned for sport competition manipulation, denying them return to the game at all levels, not just in the league where the offence occurred. Life bans are a possible option.
 - Bans and financial punishments targeted towards players who do not speak out, even if they are not directly involved in the manipulation.
 - Sanctions should be consistent, or at least there should be a minimum standard.
- Sanctioning and punishment should be transparent and made clear to the sport actors. The saliency of these punishments, potentially using case studies in the education session, could be a useful tool to make a player or officials more compliant with regulations concerning sport competition manipulation and more likely to report
 - When cases are sanctioned by sport federations or prosecuted under criminal law, the punishments should be consistent

4.6. Betting

Issue(s)

- Match-fixing is motivated by criminals manipulating the betting market, which means the betting authorities must respond. Simply outlawing betting is insufficient, as the betting will occur in underground markets regardless
- Esports is a growing betting market and the regulatory scene is vast, disjointed, and with limited oversight.

Possible Response(s)

- The NBA of Cyprus should ban those matches at high risk for sport competition manipulation, or at least place restrictions on those matches
 - Friendlies
 - Amateur matches
 - Youth matches

- End of season matches
- Awareness of this threat of esports needs to be improved and measures should be proactively taken to monitor and restrict the esports betting market
 - Sport governing bodies could revise their policies regarding misuse of inside information to include any participants or officials involved in Esports events.

4.7. Cryptocurrency

Issue(s)

- The advent of cryptocurrencies now allows individuals to gamble online with almost total anonymity. Moreover, cryptocurrencies do not require a third party like a bank or credit card provider in the payment process, which means
 - costs are lower
 - transactions operate outside of the government regulation
 - transactions are borderless because there are no exchange rates or fees.
- Cryptocurrency sites have distinct advantage over regular betting sites
 - reduced transaction fees
 - better odds because bookmakers do not involve themselves at all with the traditional financial gatekeepers
 - The transparency provided by blockchain technology offers protection against untrustworthy operators
 - Betting operators benefits because cryptocurrency transactions are irreversible

Possible Response(s)

- 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. Wins on such sites should constitute a financial advantage.
 - Sport competition manipulation laws and betting regulations that exist in Cyprus 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).

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