

ABOUT SEPARATE CURRICULUM OF THE AWARENESS RAISING PRACTICAL SESSION FOR MALTA

This curriculum was prepared by CSCF Sport Integrity in collaboration with Malta. The purpose of the curriculum was to fully understand the phenomenon and the motives of the sport competition manipulation that impacts sports in Malta. 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 Malta.



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



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NEXT

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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 Malta 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 Maltese sport.

Section One describes the IntegriSport project and its overall purpose. It includes a description of the Awareness Raising Practical Session (ARPS) that occurred in Malta 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 Malta. A comprehensive background is provided that explains what risk factors exist in Malta, 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 Malta 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.

This Malta 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 Malta curriculum is designed as a pedagogical material in order to fully understand the phenomenon of sport competition manipulation that impacts Maltese sport. 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 Maltese sport. As such, CSCF will continue to combat sport competition manipulation in Malta 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 Malta

This session, hosted in Malta 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 Malta 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 26 and 27, 2022, CSCF, in coordination with the hosting country partner, the Malta Police Force, executed an unprecedented local event (ARPS) for law enforcement and prosecutors in the fight against the phenomenon of sports manipulation.

The session was supported by presentations and exchanges by local and international experts, namely CSCF; the project partner - the Malta Police Force; a few Maltese speakers; the Global Lottery Monitoring System (GLMS); the supporting organisation FIFPro; and Interpol and the Council of Europe, who are supporters of the project.

Notable current and former footballers also shared their experiences and needs with law enforcement and judicial authorities present, including Samir Arab, a former national team player; Andrei Agius, a current national team captain; Andrea Cassar; and Carlo Mamo, the President of the Maltese Players’ Union.

Moreover, the session made a vital contribution to the developments in

Malta 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.

Speaking about the event that brought together over 50 local participants, Inspector Anthony Scerri stated that: “The Awareness Session of IntegriSport Next gave us the opportunity to bring together in one place all the main actors working directly or indirectly to combat this phenomenon, not only locally but also internationally, including CSCF, GLMS, CoE, Interpol and FIFPRO. Even though we are a small country, this is a fact that rarely happens and, thanks to the project, we had two full days where we all sat down and openly discussed policies, challenges, and possible solutions to a problem that we all recognize, although with still many gaps that need coordinated actions”.

Of particular note was the **parallel multilateral meeting**, which within the framework of the session, **CSCF organized** together with its experts as well as representatives of the **Authority for Integrity in Maltese Sport (AIMS)**, the coordinator of the **Maltese National Platform**, the **Maltese Police Force**, the **Maltese Betting Authority** and the **Council of Europe**. This meeting was about the future of national actions on fighting sports manipulation, cooperation and the role of the future Maltese National Platform in implementing measures of the Council of Europe Convention on Manipulations of Sports Competitions.

Dr. Norbert Rubicsek, former Lt. Colonel at the Hungarian Police and CSCF Director, added: “One of the objectives of IntegriSport Next is to enhance the

collaboration between stakeholders of our partners in fighting against sport manipulation. The meeting with the Maltese stakeholders on the activities of the Maltese National Platform was a great example of this important point. We had a comprehensive exchange of thoughts and ideas on mutual operational measures against match-fixers. It was a pleasure and a great experience to support the Maltese stakeholders in their fight against the manipulation of sports competition”.

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 Malta is below. In order to obtain the presentations in more detail, please contact The Malta Police Force (brandon.agius.1@gov.mt) or CSCF (integrisportnext.admin@cscfsport.com).

ARPS Day 1 Presentations

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

DC Alexandra Mamo, Investigations & Technical Support - Deputy Commissioner DG Stefania Sgandurra, Director General Strategy & Support, Malta Police Force Mr. James Grech – Superintendent Financial Crimes Investigation Department Mr. Norbert Rubicsek - Director CSCF Foundation for Sport Integrity

Project Introduction & Research findings IntegriSport Next E+ Speaker:

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

The Macolin Convention and the Council of Europe policy:

Giving you the tools to fight the manipulation of sport competitions
Speaker: Nicolas Sayde Coordinator, Sport Integrity Division - Council of Europe

Fixing the Risks: Understanding Event Manipulation

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: Ms. Lorraine Pearman IntegriSport Next E+ Expert - CSCF Foundation for Sport Integrity

The new integrity in sport and good governance legislation establishing a new regulatory body - Part I

Speaker: Dr Karen Zammit Southernwood & Mr. Ryan Borg (Director of Sports Malta – National Sports corruption platform)

The new integrity in sport and good governance legislation establishing a new regulatory body - Part II

(Round table discussion) Representatives from: Dr Karen Zammit Southernwood & Mr. Ryan Borg (Director of Sports Malta – National Sports corruption platform)

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

Speakers: Ms. Frederique Winia & Mr. Loic Alves Director Member Services & Senior Legal Counsel - FIFPRO

Perspective of a football player on the issue of sports manipulation

Sharing of the experience on the issue of sports manipulation (match-fixing) and giving a personal perspective on what is important to get more players to report.

Panel discussion: Mr. Andre Agius, Professional Footballer Mr. Carlo Mamo, Professional Footballer Mr. Samir Arab, Professional Footballer Mr. Andrea Cassar, Professional Footballer Ms. Cassandra Fernandes, Legal and Projects manager at GLMS (Moderator)

Sport betting monitoring and policy making at the national level

Speaker: Ms. Sultana Rowana & Mr. Shaun Mumford Malta Gaming Authority

Presentation on sport betting and sport manipulation – betting monitoring and policy making at the international level

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

Speakers (hybrid): Mr. Luca Esposito: General Secretary Ms. Cassandra Fernandes: Legal and Projects manager Mr. Brian Petersen (Online) Monitoring & Analysis Coordinators - European hub Global Lottery Monitoring System (GLMS)

Perspective of Aquatic Sport Malta on the issue of sport manipulation

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: Dr. Joe Caruana Curran Aquatic Sport Malta

The perspective of a local sports organization on how it works to prevent and investigate matchfixing

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: Dr Herman Mula Integrity Officer at MFA

ARPS Day 2 Presentations

Examples on investigating on sport manipulation, good practices, bad practices, hurdles, and solutions.

Speaker (Online): Mr. Claudio Marinelli INTERPOL - Criminal Intelligence Officer & Project Manager, Integrity in Sport

The Maltese NOC's actions on preventing the manipulation of competitions to safeguard the integrity of Maltese sports

Speaker: Mr. Kevin Azzopardi Maltese Olympic Committee - SPOC

Criminal Offences in relation with sports manipulation

Speaker: Dr. Daniel Buttigieg Advocate (Tribunal MFA)

Virtual Currencies

Speaker: Insp. Brady Jo Zammit

Manipulation of sports competitions using virtual currencies and the dark web

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): Mr. Gergely Vesszós IntegriSport Next E+ Expert - CSCF Foundation for Sport Integrity

Presentation of the investigation of a local sports manipulation case What are the challenges and opportunities?

Speakers: Prosecutor Mr. Sean Xerri de Caro (AG), Insp. Anthony Scerri (MPF), and Insp. Wayne Rodney Borg

Presentation of a case of sport manipulation outside Malta (corruption, fraud, money laundering) - Prosecution Service Hungary - (in Hungarian with interpretation in English)

Speaker (Online): Peter Szabadi dr. – Prosecutor

Peer-to-peer meeting: Case studies – Group session - Podium discussion

Representatives from:

- Malta Police Force: Insp. Anthony Scerri (MPF), and Insp. Wayne Rodney Borg
- Malta Prosecutor: Prosecutor Mr. Sean Xerri de Caro (AG), Dr Adrian Camilleri (AG) (MFA not AG)
- INTERPOL: Mr. Claudio Marinelli (Online) - Criminal Intelligence Officer & Project Manager, Integrity in Sport
- Malta Football Players Association: Mr. Carlo Mamo (General Secretary)
- Tribunal MFA: Dr. Daniel Buttigieg (Advocate)
- Prosecution Service Hungary: Peter Szabadi dr. – Prosecutor (in Hungarian with interpretation in English)
- Global Lottery Monitoring System (GLMS): Mr. Luca Esposito: General Secretary; Ms. Cassandra Fernandes, Legal and Projects manager; Mr. Brian Petersen (Online) Monitoring & Analysis Coordinators - European hub
- CSCF Foundation for Sport Integrity: Mr. Norbert Rubicsek– IntegriSport Next E+ Manager & Director (Moderator)

TOPIC: Setting guidelines and collecting and using information in investigations of cases of manipulation in sports

- The difficulty of collecting good evidence of sports manipulation
- Development of guidelines on effective investigation and prosecution of sport manipulation cases
- Implementation of whistle-blowing systems
- Planning of awareness rising and education policies on the topics
- Reviewing guidelines for transferring cases from one investigative authority to another
- Cooperate between police authorities and sport-related authorities



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 knowledgably 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 MALTA



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3. Understanding the Current Situation in Malta

3.1. Background

Malta, the smallest EU member state, is characterized by a polarized society (Aquilina & Chetcuti, 2014). The culture and language are a mixture of Europe and North Africa, and a division in political allegiances exists between the pro-British and pro-Italian branches. Accusations of nepotism, bribery, embezzlement, fraud, and political abuse of power are worryingly consistent over the last few decades (Aquilina & Chetcuti, 2014). There is a necessary shift required in Malta to combat corruption in the country. The shift is occurring, but the wheels appear to be moving slowly. Corruption is so normalized in the sport culture that some officials and administrators claim they do not see the harm in bribing and corruption as long as their team succeeds (Micallef, 2017). Additionally, there exists criticisms of Malta for having a prevailing law of *omertà* (a code of silence) embedded in their culture (Calleja, 2017). This culture of silence legitimizes and normalizes corruption in all areas of society, including sport (Pérez Trivico, 2018).

Football in most European countries serves as a marker of national identity and prestige (Aquilina & Chetcuti, 2014). In Malta the opposite appears to be the case: "unlike other European nation states, which use football as a tool to establish and reaffirm their national identity, the Maltese national team has long been deemed inept in this regard" (Aquilina & Chetcuti, 2014, p. 114). The national league also plays at a relatively low level compared to the rest of Europe. This certainty of failure in international competition and the relatively weaker national league compared to the rest of Europe may explain why officials and

players are more willing to participate in corruption and the manipulation of matches (Aquilina & Chetcuti, 2014).

There are many incidents of sport competition manipulation in Maltese sport in the last decade. This report only highlights some of the most recent cases. In 2015, Francesco Baranca, the general secretary of Federbet at the time, stated that Malta's league championships are little more than an exercise in sport competition manipulation (Barry, 2015). Results cannot be trusted because of the large incidence of cases and the lack of perceived commitment from sport, legislative, and criminal authorities as explained below. Football officials note a concern that the popularity of football is decreasing as a result of this tarnished reputation (FFM Malta, 2021). Refusal to acknowledge the problem is a commonly cited concern in Maltese sports culture, and accusations focus on the lack of direct cooperation from the key stakeholders in football (Barry, 2015; Aquilina & Chetcuti, 2014; Calleja, 2017). There are many worrying consequences to this. For example, in February 2014 former Integrity Officer Tabone explained in his Newsletter #27 how this perception damages the reputation of sport actors and the image of sport as a whole in Malta. During job interviews, one employer of a local business, unrelated to football, allegedly asks about applicant background related to football (Tabone, Newsletter #27). If he discovers the applicant a football player, he strikes them off his candidate list. He does so because footballers are perceived to be of a less than ideal character because of their participation in that sport.

3.2. Relevant National Stakeholders

Each sporting Federations 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 (FFM Malta, 2021). 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.

The MFA and Maltese Gaming Authority (MGA) have their own Integrity Unit/Officer, but there is no national strategy or integrity authority that dictates discovering, investigating, sanctioning incidents of event manipulation. Nevertheless, the creation of such a national authority is currently in process (FFM Malta, 2021).

3.2.1. Malta Football Association (MFA)

- MFA structure
 - Council as its highest authority, which gather reports of clubs and member associations.
 - Executive Committee comprises representatives from different divisions as well as from the member associations.
 - CEO joins the highest-ranking officials in a so-called Bureau, namely president, secretary general, VPs, and Treasurer of Association.
- Anti-Corruption Task Force established in 2015 led to the introduction of the Prevention of Corruption in Sport Bill ("Dr. Herman Mula", 2020).
 - This task force focused on education, strengthening the legal framework against sport competition manipulation, and providing more resources for the police.
- The MFA is responsible for its own education programs related to sport integrity,
 - Franz Tabone released Newsletters on matters of sport integrity during his time as Integrity Officer (Tabone Integrity Officer Newsletters) These Newsletters provide information from 2012 to 2020 on the state of Maltese sport corruption.
 - Malta FA Integrity Tour: In 2013, MFA in partnership with Sportradar and Betaland announced the launch of this educational program aimed at combatting betting-related corruption in Maltese football ("Malta FA Integrity Tour", 2013). The program is aimed at educating players, referees, and club officials about relevant issues of sport competition manipulation.
 - 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 ("Dr. Herman Mula", 2020).
 - His appointment was intended to facilitate the creation of a dedicated Anti Match-Fixing Unit.

3.2.2. Malta Football Players Association (MFPA)

maltafpa.com

- Established in 2011
- Protects the rights of players and promotes their best interests (by providing legal advice)
- Regulations and statutes can be found on their website (<https://www.mfa.com.mt/en/the-mfa/themfa/8/statute-and-regulations.htm>). T
- Launched and monitors the Red Button App ("MFPA Provides an Anonymous Reporting Mechanism", 2020.)

3.2.3. Ministry of Education

<https://education.gov.mt/en/Pages/educ.aspx>.

- Part of the government of Malta. Equipped with the tools necessary to fight sport competition manipulation at state and association level and aims to work together across borders against sports manipulation (Grech, 2018b).
- They organize and implement the national sport corruption strategy.
- Malta Sports Council (SportMalta): Mission is to promote and develop sport for Malta.
 - Implement government policy of sport and establish dispute resolution structures.
 - Regulatory framework for sports organizations can be found on their website: <http://sportmalta.mt/assistance-schemes/resources/>.

3.2.4. Executive Police

- Investigates and initiates criminal proceedings related to event manipulation
- Serves as the umbrella organization to all sports in terms of responsibility for discovering, investigating, and sanctioning incidents of event manipulation.
- Has a dedicated unit within the police to deal with sport manipulation specifically (FFM Malta, 2021).

3.2.5. National Platform (Sports Integrity Authority)

- The National Platform (called AIMS) is expected to be established by the end of 2021 within a sport integrity unit, that will include the police, Sports Malta, Malta Football Association, Malta Gambling Regulator, the Judiciary of the Government departments, and other ministries of sport (FFM Malta, 2021; Agius, 2021). S
- Will bring stakeholders together to share information, raise awareness, and use educational campaigns to prevent sport competition manipulation (Agius, 2021). In line with other national integrity bodies, its scope will extend to other issues such as anti-doping and good governance.

3.2.6. Court of Magistrates

- The working power of the criminal justice system in Malta with both civil and criminal jurisdiction.
- They take on the role of investigator in sport corruption cases.

- According to the Criminal 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, they may not investigate on their own account.

3.2.7. Malta Gaming Authority (MGA)

<https://www.mga.org.mt/about-us/organisation-chart/>.

- The MGA is divided into 6 directorates that report to the CEO's office:
 - Operations;
 - General Counsel;
 - Regulatory;
 - Finance & Programme Management;
 - Risk; and
 - Technology
- It is also composed of a variety of Councils and Committees including:
 - Supervisory Council;
 - Audit & Risk Committee;
 - Commercial Communications Committee;
 - Compliance & Enforcement Committee; and
 - Fit & Proper Committee
- Sports Betting Integrity Department (SBID): Developed as part of initiative to increase focus and resources toward fight against manipulation of sports competitions (FFM Malta, 2021)
 - Works with international partners and other stakeholders in the betting industry, sport, and law enforcement bodies in order to recognize vulnerabilities, encourage precautionary measures and strengthen deterrents to corruption in sport betting.
 - SBID gathers intelligence and information relating to suspicious betting and serves as a liaison in investigating cases pertinent to manipulation of sports competitions.
 - Serves as a liaison between licensed betting operators and its sport integrity partners when investigating cases of sport competition manipulation.
 - Has a data-sharing-agreements with the International Tennis Integrity Agency, Darts Regulation Authority, World professional Billiards & Snooker Association, Swedish FA, Slovak FA, International Cricket Council, Malta FA (FFM Malta, 2021). It also has a Memorandum of Understanding with IOC, International Betting Integrity Association, and ESIC.
- Rules and Regulations: Beginning January 1, 2021 MGA required operators who suspect manipulation activity or aberrant betting behavior to immediately inform MGA.
 - MGA offers Suspicious Betting Reporting Mechanism (SBRM) solution to all of its license holders. This Mechanism allows licensees to report suspicious instances in streamlined and secure manner.
 - Does not allow athletes to bet on their own competitions.
- The Sports Integrity Unit also analyzes data received by the MGA, to look for potential links between bettors and athletes. The MGA may share this information with local and foreign regulators in the public interest or when investigating a criminal offence.
 - This transfer of data is required when in the process of detecting, preventing, and investigating:

- money laundering;
- terrorist financing;
- fraud, identity theft, misappropriation of funds;
- computer misuse; and
- manipulation of sports competition.
- The MGA can request data from betting operators and share that data with police, local regulators, and foreign regulators. They can share personal data with sport governing bodies and other platforms
- Partnerships:
 - MFA
 - MGA has a partnership through data-sharing with MFA (Gallagher, 2019) in order to identify and prevent corruption.
 - This partnership coheres with the establishment of the Sports Integrity Unit at the MGA.
 - Share ideas of best practices for the benefit of both parties.
 - Swedish Football Association (SvFF).
 - Data-sharing partnership
 - Discuss best practices and share betting information.
 - Esports Integrity Coalition (ESIC)
 - Memorandum of Understanding.
 - The MGA works with operators who provide Esports to relinquish information on suspicious betting patterns
 - MGA assists ESIC in investigation of suspicious betting on Esports events and competitions.

3.2.8. Sports Malta

<http://sportmalta.mt/>.

- Regulator of all sport in the country.
- Support work against sport competition manipulation cases and other integrity threats.
- Function as cooperative body by putting partner organizations in touch with sports governing bodies
- The establishment of AIMS (the new National Platform) at the end of 2021 will take over the responsibilities of Sports Malta (FFM Malta, 2021).

3.3. Risk Factors

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

- 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 (Aquilina & Chetcuti, 2014). These are both evident in cultural context of the sporting world and broader Maltese society. Former Integrity Office Tabone explained in his Match 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 competition manipulation. In this same Newsletter #28, Tabone explicitly expressed disappointment that officials were not in attendance during education sessions, 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 (Grech, 2018b).

FIFPro dropped Malta from pool of countries chosen for the 2012 Black Book Eastern Europe Survey (FIFPro, 2012). This survey was intended to investigate to what extent players were approached with a view to manipulating the 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 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 (Aquilina & Chetcuti, 2014; FFM Malta, 2021). 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 public displays very little interest in the sport. Football leagues in Thailand, Malaysia, and Vietnam effectively collapsed for a time due to similar problems as a result of sport competition manipulation (Hill, 2010). 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 (Micallef, 2017). 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 (Muscat, 2019). This explains why club officials are more likely to comply and participate in corruption. The players are also not paid well and are commonly not paid on time (Aquilina & Chetcuti, 2014; Muscat, 2019). The literature notes that the poor financial situation of players and referees is a risk factor of sport competition manipulation (Szymanski, 2003, Boeri & Severgnini, 2013; Vamplew, 2018).

There are many cases of sport competition manipulation in Malta, as noted in the next section, even though the tools are supposedly in place to combat sport manipulation at an international, European, and even local level (FFM Malta, 2021). 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 competition 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 competition 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.

3.4. Cases

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 (FFM Malta, 2021). The case becomes their responsibility, and they are aided by the Magisterial Inquiry who assume 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 noted by Scerri (2021) 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, and importantly, sporting authorities do not possess and therefore are not allowed to 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 properly 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 competition manipulation ultimately falls on law enforcement.

3.4.1. Attard F.C. January 2021

Brincat, Edwina. "Man Fined €50,000 and Handed Suspended Sentence Over Match-Fixing." Times of Malta, 13 Jan. 2021, <https://timesofmalta.com/articles/view/man-fined-50000-and-handed-suspended-sentence-over-match-fixing.844709>. Accessed 16 July 2021.

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3.4.2. Antoni Ricci Arrest 2019

"Alleged Mafioso Arrested in Malta, Advised the Malta Football Association on Anti-Match Fixing Program". Manuel Delia, 21 Apr. 2019, <https://manueldelia.com/2019/04/alleged-mafioso-arrested-in-malta-advised-the-malta-football-association-on-anti-match-fixing-program/>. Accessed 16 July 2021.

3.4.3. 2018 U21 Scandal

"UEFA Bans Six Malta Under-21 Players for Match-Fixing Offences." UEFA, 9 Jan. 2018, <https://www.uefa.com/insideuefa/protecting-the-game/news/0241-0f8e5b3ce9d8-76f657085c0c-1000--uefa-bans-six-malta-under-21-players-for-match-fixing-offences/>. Accessed 16 July 2021.

3.4.4. 2013 Scandal

"Four Maltese Players Handed Life Bans for Match-Fixing." Arab News, 10 Apr. 2013, <https://www.arabnews.com/node/447534/amp>. Accessed 16 July 2021.

3.4.5. European Championships 2008 Qualifier Match Norway vs. Malta

Aquilina, D., & Chetcuti, A. (2013). Match-fixing: the case of Malta. *International Journal of Sport Policy and Politics*, 6(1), 107–128. doi:10.1080/19406940.2013.777938

Muscat, M. (2019). The situation of bribery and corruption in sports with particular attention given to the Maltese scenario. LinkedIn. <https://www.linkedin.com/pulse/situation-bribery-corruption-sports-particular-attention-muscat/>. Accessed 16 July 2021.

3.5. Whistleblowing and Reporting Channels

Importantly, the Attorney General may grant exemption from criminal proceedings in cases of whistleblowing in Malta.

The 2018 Sport Act mandates that players must report if approached immediately (<https://legislation.mt/eli/cap/593/eng>). In the past, players who did not report were punished with a ban of 1-2 years. 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 (FFM Malta, 2021).

The Red Button app was provided to Malta so that players could report anonymously (Busuttil, 2020). However, questions remain about the ability to protect player that anonymity (FFM Malta, 2021). 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 competition manipulation (FFM Malta, 2021)

3.6. Regulatory Legislation/Recent Developments

The original legislative model in Malta dated back to the 1970s. Malta has subsequently made significant and necessary advances in their regulatory legislation, specifically in their Criminal Code. They now possess a competent legislative tool to punish and criminalize sport competition manipulation. Their laws and regulations are also now in line with that of the European Union, as they are a member state. Sport competition manipulation cases are prosecuted through regional and/or national legal bodies who have their own tribunals. Subjects can be tried under the criminal law in a court of law, or before a sports tribunal. These two bodies are independent of each other.

Criminal Code.

https://www.un.org/depts/los/LEGISLATIONANDTREATIES/PDFFILES/MLT_criminal_code.pdf. Malta has specific sport offences on sport competition manipulation through criminal law. It has been alleged that there have been mistakes made in court rooms and investigations regarding competitive sport manipulation (FFM Malta, 2021).

Prevention of Corruption in Sport Act (Article 2/5/9, Chapter 593 of the Laws of Malta), 2018.

<https://legislation.mt/eli/cap/593/eng>. This Act replaced the 1976 piece of legislation. It expanded the definition of sports competition manipulation by including corruption for illegal gains from bets on sports results, increased fines, and extended the jurisdiction of local courts. In addition, the penalties became harsher for instances of failure to report. The Bill was drawn up by a taskforce including representatives from the government, MFA, MGA, and Sports Malta:

Under this new Act, the punishments have been strengthened. For example, there is no longer the possibility for suspended sentences in relation to sport competition manipulations that involve bribery (FFM Malta, 2021). According to this Act, if someone is convicted of manipulations involving bribery, the penalty is imprisonment, without a suspended sentence, and a fine. Clubs are also held to a higher standard under the new Act (FFM Malta, 2021). Vicarious Liability applies to football clubs, which means if a member of the club is prosecuted for sport manipulation then the club can also be subsequently punished. Again, there is no longer the possibility for suspended sentences to be handed down in these cases.



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 Malta 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 Malta.

4.1 The Malta deadlock

Issue(s)

- Malta refuses to sign or ratify, let alone support, the convention because of the definition of illegal sports betting.
 - Malta gambling law allows operators the right to offer online gambling and sports betting in all EU jurisdictions, as long as those jurisdictions do not have a national law to restrict gambling. The Macolin Convention is seen by Malta as a threat towards their gambling industry.

Possible Response(s)

- The Assembly's Standing Committee found no justification for Malta to contest the Convention's definition surrounding illegal gambling ("PACE Urges EU", 2020).
 - PACE is urging Malta to end the deadlock.

4.2. Education

Issue(s)

- Former Integrity Officer Tabone noted in his Newsletter #54 in 2018 a lack of attendance from club officials and committee members at education sessions
- Education sessions are limited if only players are in attendance
- 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
- Education efforts should focus on prevention and informal workshops to help investigations into incidents of sport manipulation (FFM Malta, 2021).
- 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 in the Malta and neighboring countries should be used
- Punishments for those discovered of wrongdoing should also be clear to the participants, as well as a realistic view of any protections offered to those whistleblowers who 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.
- 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 Malta.
 - 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.

4.3. Whistleblowing

Issue(s)

- Anonymity protection is low in cases of sport manipulation. Malta is a small nation and people are easily found out and/or exposed, making it difficult to protect whistleblowers.
- No clear reporting lines for reporting suspected manipulation of sport events (FFM Malta, 2021)
- The whistle-blowing policy has never been used before (FFM Malta, 2021).
 - Athletes are aware of the law, but the law is not clear about anonymity protection in respect to Red Button App
 - an individual could report anonymously and then have charges filed against him or her if they are identified by the police during the investigation. The police would file charges publicly without ever knowing that the same person was the one who reported the incident anonymously

Possible Response(s)

- The new National Platform to be established by the end of 2021 could be responsible for centralizing Malta's reporting system (FFM Malta, 2021).
- Improve anonymity protection, or protection after they report, either through sporting regulation or through legislation
- 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
 - Could request a Magisterial Inquiry as a private citizen.

4.4. 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 originator the manipulation behind the scenes.

- 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 Malta if they cannot protect anonymity.
- Even if a case is discovered through monitoring the betting market or through reporting, law enforcement is reluctant to get involved because of the difficulty of investigation. Police will not consider sport competition manipulation investigations a priority if they believe that the crime cannot be investigated effectively

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 the MGA)
- 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.

4.5. 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 prosecuted under criminal law, the punishments should be coherent and consistent

4.6. Betting

Issue(s)

- Match-fixing is motivated by criminals manipulating the betting market, which means the MGA 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.
- MGA noted in 2020 that Esports lacks integrity checks (Parker, 2020).

Possible Response(s)

- The MGA 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
 - The MGA claimed that sport governing bodies should 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 Malta 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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