



© Shutterstock

Mapping of Corruption in Sport in the EU

A report to the European Commission

December 2018

EUROPEAN COMMISSION

Directorate-General for Education and Culture
Directorate C – Innovation, International Cooperation and Sport
Unit C.4 – Sport

E-mail: Eac-sport@ec.europa.eu

*European Commission
B-1049 Brussels*

Mapping of Corruption in Sport in the EU

A report to the European Commission

written by

Ecorys and Dr. Argyro Elisavet Manoli (Loughborough University)



Disclaimer

This document has been prepared for the European Commission; however, it reflects the views only of the authors, and the Commission cannot be held responsible for any use which may be made of the information contained therein.

***Europe Direct is a service to help you find answers
to your questions about the European Union.***

**Freephone number (*):
00 800 6 7 8 9 10 11**

(*) The information given is free, as are most calls (though some operators, phone boxes or hotels may charge you).

More information on the European Union is available on the Internet (<http://europa.eu>).

Luxembourg: Publications Office of the European Union, 2018

ISBN 978-92-79-98195-1

doi: 10.2766/325346

© European Union, 2018

Reproduction is authorised provided the source is acknowledged.

Table of Contents

Table of Contents	1
1.0 Introduction.....	5
1.1 Background to the study	5
1.2 Aims and objectives.....	5
1.3 Study method	6
1.4 Report structure	6
2.0 Strategic and policy context.....	8
2.1 Introduction.....	8
2.2 Policy context	8
2.3 EU level programmes and initiatives	9
3.0 Sport and corruption: concepts and typologies	10
3.1 Introduction.....	10
3.2 Basic definitions of corruption	10
3.3 Typologies of corruption	11
3.4 Corruptions in sport: definitions and scope	11
3.5 Types of corruption in sport	13
4.0 International initiatives	16
4.1 Introduction.....	16
4.2 Specific international initiatives	16
5.0 Evidence on prevalence of corruption in sport	19
5.1 Introduction.....	19
5.2 The prevalence of corruption in sport across the EU	19
5.3 Evidence on the drivers of corruption and risks	26
6.0 Analysis of governmental responses	29
6.1 Introduction.....	29
6.2 Types of responses	29
6.3 Types of corruption addressed	41
7.0 Key conclusions and recommendations.....	49
7.1 Key conclusions.....	49
7.2 Recommendations	50
Annex One: Sources	52

Executive summary

The Directorate-General for Education, Youth, Sport and Culture (DG EAC) of the European Commission commissioned Ecorys in July 2018 to undertake a mapping review of sport and corruption across the EU28.

Background

Recent high profile cases of corruption in sport have shown the potential damage corruption cases can cause to sport's reputation for integrity and fair play. Corruption has been shown to manifest in varying contexts ranging from non-profit community-based activities through to activities involving high profile international events. In addition to traditional forms of corruption, particular types of corruption such as match fixing, spot fixing and doping are unique to the industry. The complex and multidimensional nature of corruption in sport has created significant challenges for sport management and policy makers in identifying where the problems lie and developing actions to safeguard the integrity of sport globally.

Aims and methodology

The key objective of this small-scale research study has been to complete a mapping review of the types of corruption that exist in different EU Member States, if/how they are dealt with at national and/or international level and what kind of legal instruments exist to deal with them and minimise potential risks. The study has sought to provide the European Commission with adequate knowledge of existing initiatives in order to identify where best to focus its efforts – and those of the Member States – in the years to come.

At the scoping stage of the study a rapid literature review was completed covering the subject of sport and corruption. The review covered academic publications, official policy documents and papers. Around 70 relevant documents were identified. The mapping of reported cases and government responses also built on responses to a call for evidence which was sent out to members of the EU Expert Group on Sport and Integrity. The second element of the desk research was to undertake systematic reviews of available data and information and evidence on relevant government and organisational responses in specific Member States. Within the limits of the resources available for the study, it was possible to complete systematic desk reviews of available evidence and information on sport and corruption in 11 countries covering a range of geographies and large and small countries. Finally, a number of responses were examined in more depth through more detailed desk research and telephone interviews with contacts in Member States. This resulted in six case studies which are presented in boxes in the findings chapter.

Key findings and recommendations

The need to tackle corruption in sport is an important element of EU's policy on sport integrity. The rapid literature review undertaken for this study has shown that the more detailed empirical studies of corruption in the EU tend to focus on the prevalence of match-fixing and doping cases. This is reflected in the mapping research for this study as despite adopting a broad definition of corruption in setting the parameters of the research, the vast majority of cases identified from recent years in the sample countries were identified as either doping or match fixing cases.

The mapping research has emphasised the complex interplay of factors and contextual issues that can influence match-fixing activity. The research has also provided insights in to the diversity of match-fixing practices and its association with other types of corruption such as bribery. Specific examples of match-fixing have also revealed the importance of factors such as pay levels of athletes and the level of media exposure of specific matches.

Aside from match-fixing and doping, the mapping review has revealed very few examples of other types of corruption in sport across the EU. This does not necessarily mean that

other types of corruption do not exist as such cases may be more difficult to detect through mapping exercise which is reliant on using rapid research approaches across a range of countries. The broader academic literature review indicates however that due to the lack of a transparent system of reporting in sport, the sport industry has become a fertile ground for other corruption activities such as money laundering and tax evasion.

The mapping of responses at the Member State has revealed a variety of measures that have been implemented in recent years. These include: new legislation; new policy initiatives; tighter regulations; more stringent fines; organisational restructuring; educational programmes; multi-stakeholder platforms for information sharing; and whistleblowing initiatives.

Based on a limited number of case studies, the research has highlighted a number of key conclusions with regard to the effectiveness of responses and particular features of promising practices in this area:

- **There is evidence that the introduction of stricter legal penalties reduces levels of match-fixing:** Legal penalties have been shown to work in countries where there was previously a high prevalence of match fixing.
- **There is a need to focus on preventative measures as well as legal penalties:** the case studies have highlighted a range of education and awareness raising initiatives that have been shown to be successful in terms of take-up amongst sport professionals and, based on anecdotal evidence, their ability to improve understanding, influence behaviour and encourage reporting of suspicious behaviour.
- **The role of multi-stakeholder groups for preventing and tackling corruption in sport:** some case studies have highlighted the potential for involving all relevant actors in addressing specific corruption practices including judicial bodies, government ministries, national sport agencies and federations.
- **There is an increasing emphasis on promoting 'good governance' practices in sport federations:** such codes are being introduced in order to address other types of management corruption such as bribery, money laundering and tax evasion, as well as more well-known forms of corruption such as match-fixing.

This small-scale research has addressed the topic of sport and corruption from a broad and open-ended perspective and therefore it has not been possible to address the prevalence of specific types of corruption in a systematic and detailed way. The research findings nevertheless provide evidence and insights in understanding how the EU could potentially add value to existing initiatives in this area. Recommended actions that could be taken to develop more systematic evidence on the topic and to further promote effective practice in this area are as follows:

- **Supporting mechanisms for cooperation in addressing corruption:** The study has highlighted various initiatives taken forward by international sport federations. There is potentially a role for the EU to add value to these initiatives by facilitating the development of new networks focused on addressing specific types of corruption. The EU's potential role would be to facilitate cooperation between the various relevant actors who have a role in addressing corruption practices. This role could involve developing multi-stakeholder groups concerned with addressing specific types of corruption based on a detailed assessment of the role of specific actors as well as current networking arrangements. Enhanced cooperation would also allow sharing of information on good practice and help to support their implementation internationally.
- **Enhancing knowledge on sport and corruption across the EU:** There are a number of potential mechanisms that the EU could use to encourage the development

of better knowledge on sport and corruption across the EU. Through the development of networks with relevant federations and more formal recommendations, the EU could help to promote more systematic monitoring of corruption cases across the EU. Building on the limited number of case studies completed for this study, it is also recommended that more systematic evidence is collected on the current state of play in the EU with regard to understanding what works well in addressing corruption in sport. This would draw on more systematic evaluation evidence including primary research with stakeholders in Member States. Generally there is a need to improve evaluation evidence on the impacts and effectiveness of government responses that aim to deal with corruption.

- **Support the development of good practice sharing and dissemination:** The EU potentially has a role to play in enhancing knowledge sharing on approaches to addressing corruption, for example through networking events for international sport federations. It is also recommended that actions are developed to support dissemination of and knowledge sharing on good practice responses. This could include European level conferences held on an annual or biannual basis that allow projects to present their approaches and good practice features. Responses to addressing corruption could also be included as a regular topic in events such as the EU Sport Forum. Building on the recommendations above, the EU could also support actions to develop capacity building of relevant authorities and sport federations in member states. The research has identified examples of practices where the promotion of common understandings and good practice may be helpful in addressing corruption (recommendations below).
- **Support the development of common understanding of appropriate and proportionate penalties for corruption activities:** This research has highlighted the potential to develop a common understanding on the use and effectiveness of appropriate penalties to address corruption practices.
- **Support the development of common definitions and measurement frameworks for 'good governance' and its component parts:** This research has highlighted a number of areas of promising practice in the development and implementation of 'good governance' approaches to addressing corruption. Building on the recommendations above, there is potential for the EU to play a role in supporting actions to develop common understanding on the elements required to promote good governance practice amongst sport federations. It is important for sport federations to understand the principles that constitute good governance, and how and why these principles can benefit the sport system and improve their operations, in order to be able and motivated to put these principles in practice. The promotion of codes of best practices in 'good governance', illustrated by the case study examples of Cyprus and the UK could be beneficial for the sport industry.
- **The role of Member States in addressing corruption:** The case studies have highlighted the particular role that Member States can play in leading strategically on the fight against corruption and in promoting transparency and information sharing at the national level. It is recommended that Member State governments address corruption in national sport strategies and national action plans based on consultation with all the relevant stakeholders. Governments should also play a role in supporting multi-stakeholder platforms to address specific types of corruption. There is also potentially a role for Member States in collecting data and evaluation evidence on the effectiveness of policy responses, in line with the recommendation above.

1.0 Introduction

1.1 Background to the study

Recent high profile cases of corruption in sport have shown the potential damage corruption cases can cause to sport's reputation for integrity and fair play. Corruption has been shown to manifest in varying contexts ranging from non-profit community-based activities through to activities involving high profile international events. In addition to traditional forms of corruption, particular types of corruption such as match fixing, spot fixing and doping are unique to the industry. The complex and multidimensional nature of corruption in sport has created significant challenges for sport management and policy makers in identifying where the problems lie and developing actions to safeguard the integrity of sport globally.

1.2 Aims and objectives

The Terms of Reference for this study set out the following key objective:

to complete a mapping review of what types of corruption exist in different EU Member States, if/how they are dealt with at national and/or international level and what kind of legal instruments exist to deal with them and minimise potential risks and in order to provide the European Commission with adequate knowledge of existing initiatives in order to identify where best to focus its efforts – and those of the Member States – in the years to come.

The key aims of the research are as follows:

- To provide a mapping of different types of corruption in sport in the EU
- To develop an understanding of how individual Members States and international authorities are addressing this problem
- To develop knowledge of good practice approaches in addressing the particular types of corruption identified and to provide information on the current risks that are faced in this area
- To identify potential actions to take forward to support the EU to develop effective measures that could support Member States to tackle corruption and add value to the existing work of other bodies

The particular objectives of the research are to:

- Review recent key academic research that defines the different types of corruption in sport as well as misconduct / wrongdoing / misbehaviour.
- Review key research and policy papers that highlight the responses and biggest risks facing Member States and the Commission in the field.
- Identify data and information on manifestations of corruption in sport across the EU and in individual Members States.
- Identify and list existing responses at national and international level aimed at fighting corruption in sport.

- Identify EU Member State level interventions that represent 'good practice' in tackling corruption in sport.
- Propose particular actions that enable the EU to develop effective policy responses in this area

1.3 Study method

At the scoping stage of the study a rapid literature review was completed covering the subject of sport and corruption. The review covered academic publications, official policy documents and papers. Around 70 relevant documents were identified. A full bibliography is provided in Annex One.

The mapping of reported cases and government responses also built on responses to a call for evidence which was sent out to members of the Expert Group on Sport and Integrity in August 2018. The purpose of the call for evidence was to generate responses that would help to steer the mapping review. 23 responses were received.

The second element of the desk research was to undertake systematic reviews of available data and information and evidence on relevant government and organisational responses in specific Member States. Within the limits of the resources available for the study, it was possible to complete systematic desk reviews of available evidence and information on sport and corruption in 11 countries covering a range of geographies and large and small countries. The following countries were included in the sample:

- Austria;
- Bulgaria;
- Cyprus;
- Finland;
- France;
- Germany;
- Italy;
- Malta
- Sweden;
- Spain;
- UK.

In summary, the country reviews addressed the following:

- Empirical evidence on specific areas of corruption in sport in need of attention and risks facing Member states (building on the general literature review above).
- Reported cases of corruption in sport and the relevant legislative and policy frameworks to fight corruption in sport.
- Evidence on the effectiveness of legislative and policy frameworks.

Finally, a number of responses at the member state level were examined in more depth through more detailed desk research and telephone interviews with contacts involved implementing the responses. This resulted in six case studies which are presented in boxes in the findings chapter.

1.4 Report structure

The report is structured as follows:

-
- Section two elaborates on the strategic and policy context to the mapping review;
 - Section three presents the key findings of the theoretical literature review;
 - Section four provides an overview of international initiatives;
 - Section five reviews some key evidence on the prevalence of corruption in sport in the EU;
 - Section six reports on the reviews of government responses in the sample countries;
 - Section seven brings the analysis together and highlights some key conclusions from the analysis.

2.0 Strategic and policy context

2.1 Introduction

This chapter outlines the policy and strategic background for the mapping review. It also briefly considers key policy developments at an EU level focused on addressing corruption in sport. This section provides an introductory context to the research, but cannot do justice to the range of policies, programmes and academic discussions that have direct relevance to the topic.

2.2 Policy context

The European Commission's White Paper on Sport (2007), the 2011 Communication on "Developing the European Dimension in Sport"¹ and subsequent EU Work Plans for Sport (2011-2014² and 2014-2017³) have all emphasised the importance of promoting integrity in sporting practices including the need to tackle corruption. Policies to address corruption in sport have emphasised the need for structured dialogue between governments and sports organisations and support for relevant projects and networks. A first priority of the Work Plans in addressing corruption has been the fight against match-fixing, as this has been commonly recognised as one of the most prevalent forms of corruption in sport. Other key priorities under the theme of promoting integrity include anti-doping and promotion of good governance.

The Communication "Towards a comprehensive European framework on online gambling" in 2012 identified integrity of sport and match-fixing as one of five key priorities. The communication included a number of measures aimed at addressing match fixing including: the need for more efficient exchange of good practices in the provision of betting-related match-fixing; establishing minimum conflict of interest provisions, for example betting bans for sport people and sport officials as well as the exclusion of youth events from betting; and introducing hotlines and other reporting or whistle-blowing alert mechanisms.

The European Commission has supported a number of initiatives aimed at understanding the state of play of measures to address match fixing and best practices in prevention, detection, sanctions and cooperation. A study on match fixing was carried out for the Commission to improve knowledge of how national criminal law provisions in the Member States applied to match fixing and identifying possible divergences or discrepancies.⁴ While the study found that match fixing is criminalised in all Member States, it also found that incrimination of sport offences did not necessarily lead to better enforcement or fewer suspicious cases. The study highlighted operational limitations in the enforcement of anti-match-fixing rules and the need to improve prosecution rates.

Following on from the Communication on online gambling in 2012, two further studies on betting-related match fixing were carried out and published in 2014. The EU Expert Group on Match Fixing (under the 2014-2017 Work Plan) has also considered the state of play of

¹ European Commission (2011). *Developing the European Dimension in Sport* European Commission. Published January 18.

² Council of the European Union (2011). *Resolution of the Council and of the Representatives of the Governments of the Member States, meeting within the Council, on a European Union Work Plan for Sport for 2011-2014*.

³ Council of the European Union (2014). *Resolution of the Council and of the Representatives of the Governments of the Member States, meeting within the Council, of 21 May 2014 on the European Union Work Plan for Sport (2014-2017)*.

⁴ KEA (2012) *Match-fixing in Sport: A mapping of criminal law provisions in the EU 27*.

the fight against match fixing in the EU. Corruption is now a focus of the Expert Group on Sport Integrity under the 2017-2020 Work Plan for Sport.

The Commission has also participated in the work of the Council of Europe on addressing corruption. The Council of Europe's Convention on the Manipulation of Sports Competitions was published in 2014. The Convention aims to provide national systems with the tools, expertise and resources necessary to address corruption. The Convention sets out a definition of 'manipulation of sports competitions', as follows:

"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. Council of Europe (2014) Council of Europe Treaty Series - No. 215 Council of Europe Convention on the Manipulation of Sports Competitions

2.3 EU level programmes and initiatives

EU level policies provide support for European projects and networks aimed at addressing corruption in sport. A number of match fixing projects were financed in 2012 as part of the Preparatory Actions in the field of sport 2009-2013. The projects included educational and awareness-raising initiatives concerning the threats posed by match fixing and illegal gambling. Since 2014 EU level actions to address corruption are covered by the sport chapter of the Erasmus+ programme where funds are allocated for collaborative partnerships promoting integrity in sport and non-profit-making European sports. Notable project examples are highlighted below:

- "PROtect Integrity": this project aims to provide face-to face education courses designed by INTERPOL and carried out by athletes themselves. Almost 15,000 European elite level and youth athletes are involved, covering 11 countries and 10 different sports. The idea is that by preventing match fixing in elite sports, the education project will help to protect grassroots sport. The project also developed the first European-wide, athlete-led whistle-blowing system.
- FIX the FIXING: aims to develop a European-wide strategic partnership between academic institutions and sports organisations, in order to empower and strengthen the fight against match fixing. Project partners will work together with those at risk for match fixing in order to co-create an evidence-based education tool with multiple stakeholders in the field of sport that will increase their awareness about corruption, fraud and match-fixing in different types and levels of sport.
- Anti Match-fixing Top Training: Moving from Nicosia Declaration (2012), Council of Europe Convention on Match-Fixing (2014), this proposal is a follow-up of: "Stop-Match-Fixing Project" (2012 EU Prep.Action) and Seminar "Match-Fixing: a Key Issue for Sports Integrity", Milan, September 2014 (EU Italian Presidency). Focus is on designing tailored training addressing it to top decision makers and media.
- The "Single Points of Contact for sports Integrity" (POINTS) project: aims to help National Olympic Committees (NOCs), European Federations (EFs) and national sport federations to strengthen their governance and to safeguard the integrity of their sport(s) and its competitions.

3.0 Sport and corruption: concepts and typologies

3.1 Introduction

This section outlines the findings of the literature review regarding theoretical developments on sport and corruption.

3.2 Basic definitions of corruption

Even though corruption is a concept often encountered in academic research, its theoretical development can be considered still in its infancy, with a consensus on its definition yet to be reached. Similarly, and despite the frequency and prevalence of the phenomenon in numerous aspects of today's society, defining corruption is a challenging task due to the word itself being an umbrella term referring to a wide range of corrupt activities, such as bribery, embezzlement or nepotism (Amundsen, 1999; Brooks et al, 2013). Additionally, corruption is a social phenomenon and thus any proposed definition will have to be based on the perceptions of the definer and the norms of the environment in which it occurs (Masters, 2015). As such, an activity that might be viewed as a serious incident in one context might be perceived as something of less importance in another, thus influencing the definition proposed.

The majority of the existing literature on the topic of defining corruption comes from the field of political corruption and illustrates the differing viewpoints of the definers. The main definitions of corruption are collated in a table below (adapted from Gorse 2013).

Table 3.1 Definitions of corruption

Definition	Source (author, year)
<i>"The abuse of public roles or resources for private benefit"</i>	Johnston (2005)
<i>"Behaviour which deviates from the formal duties of a public role because of private regarding (family, close private clique), pecuniary or status gains, or violates rules against the exercise of certain types of private-regarding influence"</i>	Nye (1967)
<i>"An act done with the intent to give some advantage inconsistent with official duty and the rights of others"</i>	Collins et al (2009)
<i>"The pursuit of individual interests by one or more organisational actors through the intentional misdirection of organisational resources or perversion of organisational routines"</i>	Lange (2008)
<i>"The abuse of public power for private benefit"</i>	World Bank (1997)
<i>"The misuse of public office for private gain"</i>	Treisman (2000)
<i>"The misuse of authority for personal, subunit and/or organisational gain"</i>	Ashforth & Anand (2003, in den Nieuwenboer & Kaptein, 2008)
<i>"The use of entrusted power for private gain"</i>	Transparency International (2006)

<i>"The misuse of an organisational position or authority for personal or organisational (or subunit) gain, where misuse in turn refers to departures from accepted societal norms"</i>	Anand et al (2005)
<i>"The illicit use of one's position or power for perceived personal or collective gain"</i>	Ashforth et al (2008)
<i>"The misuse of authority for organisational gain and conduct punishable by criminal, civil or regulatory law"</i>	Pfarrer et al (2008)
<i>"Corruption is the misuse of power in the interest of illicit gain"</i>	Andersson & Heywood (2009)

3.3 Typologies of corruption

In order to assist in our understanding of corruption, various typologies of corruption have been developed. While these typologies stem from the general corruption literature, they can be implemented and used to classify corruption in sport as well.

- First, the three main strands of corruption were introduced (Philp, 1997; Heidenheimer, 2002); namely the public office-centred, the public interest-centred and the market-centred. The public office-centred refers to behaviour which deviates from public duties, the public interest-centred focuses on corruption that can damage the public interest, and the market-centred is concerned with corruption that aims on income maximisation.
- Second, 'Petty and Grand' corruption was proposed by Rose-Ackerman (1999), who uses the size of the corrupt act that was carried out as a distinguishing factor.
- Third, 'Active and Passive' corruption was introduced by Capasso and Santoro (2017), who focus on the entity that has more bargaining power.
- Fourth, 'Need and Greed' corruption in which a distinction is made between the individuals who 'need' to commit acts of corruption and those who are driven by 'greed' in order to gain an advantage (Bauhr, 2017).
- Fifth, Heidenheimer's (2002) 'grayness' of corruption, in which a corrupt action is classified based on its perceived severity. As such an act of corruption is deemed Black when the majority of people would want to see punishment for it, White when the majority of people would not want to see punishment for it and Gray when a consensus among people regarding punishment for it cannot be reached.

3.4 Corruptions in sport: definitions and scope

Corruption in sport is not a new phenomenon, but rather an issue endemic to sport, with the first case of match-fixing recorded as early as 388BC when Eupolos of Thessaly won a gold medal in boxing in the Olympic Games by bribing three of his opponents, including the reigning champion Phormion of Halikarnassos (Maennig, 2005). At the same time, findings show that guidelines for punishment for doping in the Olympic Games was also recorded as early as the 3rd century BC, with the suggested sentence being enslavement.

Nowadays, corruption in sport is viewed as a widespread phenomenon, ranging from organised crime in big international events and competitions to small-scale opportunity

driven transgressions in local clubs and organisations (Manoli et al., 2017). Similarly, and due to its various forms and manifestations, corruption in sport has been difficult to investigate, measure and challenge.

Unlike political corruption, corruption in sport has not been explored in such detail in the existing literature. The most prominent definitions of corruption in sport follow, however as it can be seen, they are all heavily influenced from the viewpoint and the focus of each definer.

Maennig (2005) argues that:

"corruption may take the form of behaviour by athletes who refrain from achieving the level of performance normally required in the sport in question to win the competition and instead intentionally permit others to win, or behaviour by sporting officials who consciously perform their allocated tasks in a manner at variance with the objectives and moral values of the relevant club, association, competitive sports in general and/or society at large".

This definition focuses on athletes refraining from achieving a win but neglects to include athletes that will conduct corruption in order to achieve a win, for example through the use of illegal performance enhancement drugs.

Gorse and Chadwick (2011) introduce one of the most cited definitions of corruption in sport, stating that:

"corruption in sport involves any illegal, immoral or unethical activity that attempts to deliberately distort the result of a sporting contest for the personal material gain of one or more parties involved in that activity".

This definition captures a broader array of corrupt behaviours and actions in sport, however, it focuses on corrupt activities that only aim to affect the result of a context, and therefore overlooks actions that might take place around and beyond a sporting event, such as money laundering and tax evasion through sport, and bribing for arranging and hosting a sporting event.

Finally, Masters (2015) introduces the broader definition of corruption in sport, according to which it is:

"the deviation from public expectations that sport will be played and administered in an honest manner"

While this definition captures a broader view of what corruption in sport can be perceived as, while removing the element of legality that has attracted criticism in Gorse and Chadwick's (2011) definition, it is largely based on the belief that sport has an inherent integrity. This inherent integrity implies that sport itself has an identity that needs to be maintained and respected and as such individuals involved in sport are entitled and should be guided by values of fairness, respect, excellence and moral equality (Simons, 1999; Gardinher et al., 2017). This can in turn raise a question on whether this inherent integrity can be still found in today's heavily commercialised sport industry.

Corruption in sport can be separated into two broad categories, competition and management corruption (Maennig, 2005). Competition corruption is the one conducted by individuals who are directly involved in a sporting event and focuses predominantly on the outcome of the said event. Management corruption on the other hand is the corruption conducted by individuals (e.g. officials) or organisations (e.g. governing bodies) that are peripheral to the event (e.g. oversee / management), and whose decisions are primarily non-competition related.

As corruption can impact on all levels of business and society, corruption in sport can have both a direct and an indirect impact on numerous aspects of sport. From the loss of outcome unpredictability, which is directly linked with a decrease in supporters' interest and the associated spectatorship income, to a loss of broadcasting interest and corresponding income, and finally to a decrease in sponsorship revenue (Gorse and Chadwick, 2011; Buraimo et al, 2016; Manoli, Antonopoulos & Bairner, 2017).

3.5 Types of corruption in sport

Corruption in and through sport can manifest itself in numerous ways of varying severity. These ways are not mutually exclusive, but on the contrary, often overlap. The prevalence of research on match fixing and doping tends to guide the overall narrative around sport corruption as these types tend to dominate academic discussions in this field. The main types of corruption will be presented below.

Match-fixing

Lamberti (2014) defines match-fixing as:

"A fixed match has occurred when a match is played to a completely or partially pre-determined result, violating the rules of the game, and often the law."

This comprehensive definition captures not only aiming to achieve a pre-determined final result, but also the efforts to achieve a partially pre-determined result, which includes activities such as sport-fixing, point-saving and tanking. Spot-fixing refers to certain actions during an event or competition (e.g. attempting to score in a specific way, getting a yellow card, injuring a player) that take place in a pre-determined way, usually to the advantage of gamblers. Point-shaving occurs in order to keep the final result within or outside a pre-determined range, once again to the benefit of gamblers with knowledge of the fixed result. Finally, tanking is a non-gambling type of match-fixing and involves a player or a team deliberately underperforming, losing a match or not competing overall, in order for another athlete or team, which might be not the immediate opponent in the match, is relegated or avoids relegation.

Match-fixing, even though often closely intertwined with betting, can be either profit or non-profit driven. Equally, it can be initiated and managed by organised crime multi-level organisations, corporate structured clusters of individuals, flat networks of individuals or small un-organised clusters of opportunity driven individuals (Manoli & Antonopoulos, 2015; Yilmaz, Manoli & Antonopoulos, 2018).

Doping

Doping is probably the most documented case of competition corruption, in which one of the following anti-doping rule violations occur; (1) the presence of a prohibited substance, its metabolites or markers in an athlete's sample; (2) use or attempted use by an athlete of a prohibited substance or prohibited method; (3) evading, refusing or failing to submit to sample collection (4) whereabouts failures; (5) tampering with doping control; (6) possession of prohibited substance or methods; (7) trafficking prohibited substances or methods; or (8) administration to athletes of prohibited substances or methods (World Anti-Doping Agency, 2015, art. 2).

Masters (2015) argues that doping should also include cases of *nobbling*, which refers to the interference with the ability of an athlete to compete at their peak performance, and *ring-ins*, which is the practice of substituting an athlete for one of better ability.

Bribery

Bribery is a traditional type of corruption applied in the sport sector. Bribery in sport can be in its simplest form a player being paid to underperform. Most commonly and more complexly however, bribery refers to host bribery, in which a number of sporting officials are paid, either in money or through expensive gifts and favours, in order to influence their decisions on where an event should be hosted. Due to the financial and soft power implications of hosting an important international sporting event, host bribery involves the exchange of money, favours or gifts in order for decisions to not be made based on merit. High profile cases of such a phenomenon include the hosting of the Winter Olympics and the FIFA World Cup (Masters, 2015).

A form of corruption that is closely associated with bribery is *nepotism* or *cronyism*. This equally traditional form of favouritism can manifest itself in various forms, from favouring one athlete in team selection over another, to selecting a host nation, a sponsor or a TV broadcaster over another based on any criteria apart from merit.

Money laundering

Due to the popularity and the rather complex and often lacking transparency system of reporting income and profit through sport, the sporting industry has been used as a money laundering system world-wide. In the most common manifestation of this phenomenon, money earned through illegal activities that has not been reported in the authorities is declared as profits through sport, an activity that allows for the 'legalisation' of the income and the justification of the lifestyle that is often associated with it (Manoli, Antonopoulos & Levi, 2016). It is estimated that more than €90.05 billion per year is laundered through sport.

Illegal gambling / betting

Betting or gambling in sport, when regulated, is a profitable and quickly developing sector globally. In fact, it is estimated that €185 to €460 billion is gambled or bet annually around the world. Unfortunately, more than 80% of this activity is believed to be through illegal channels that are not regulated, controlled, reported or taxed. At the same time, it can involve a number of individuals acting as 'middle-men' and obstructing further in this way the traceability of the actions taking place. As a result, the complete magnitude of this phenomenon has not and cannot be studied in detail.

What research so far suggests, however, is that illegal betting can be considered both the incentive and the reward for other forms of corruption in sport, such as match-fixing, doping or bribery, making it a significant threat to the future of sport (Manoli et al., 2016).

Tax evasion

Due to the above-mentioned complex and transparency lacking system of reporting in sport, the sport industry has become a fertile ground for both money laundering and tax evasion. The latter involves either the generation of unreported profit or the exaggeration in the reporting of expenses without in fact making the payments declared (Manoli et al., 2016). The unreported profit includes income generated through both legal (e.g. unreported ticket sales) and illegal (e.g. illegal betting profits) avenues. The reporting of exaggerated expenses refers to expenses declared (e.g. payments of athletes) that are reported as paid, when no actual payment is made (see guidance offered by FIFPro, 2013). It is estimated that more than €16.43 billion per year in taxes is evaded world-wide through sport, a phenomenon that is further assisted by the common lack of paper trail in the sport industry, as well as by methods of 'creative accounting', such as cross-border transfers, offshore accounting and third-party agencies.

Misuse of inside information

In addition to betting related match-fixing, there have been cases of betting by athletes or officials misusing 'inside information' to make substantial profits from betting operators and their consumers. As such, Gorse and Chadwick (2011) argue that it is important to include cases of betting based on the misuse of inside information as ultimately, the betting industry loses money from this activity, just as in cases of match fixing.

Commercial corruption and governance 'tricks'

Due to both the significant amount of money available within the sport industry and the lack of strict control to the organisations and individuals within it, commercial corruption in sport can manifest itself in the following ways (see Manoli et al., 2016; Masters, 2015; Transparency International, 2016);

Ticket 'tricks', the practice that refers to the reselling of tickets for sporting events, the false reporting of ticket sales or even the selling of fake tickets. Ticket 'tricks' have been studied in contexts ranging from major international events to small-scale local matches.

Commercial partnership 'tricks' can refer to either the reporting of 'fake' commercial agreements that can justify an influx of income, the dissolution of an existing commercial agreement without honouring its closes, or the selection of a commercial partner based on any criteria apart from merit.

Broadcasting rights 'tricks' refers to the practice of not-following a transparent process when selling the broadcasting rights to an event or competition, for example when selecting the broadcaster. Not disclosing potential conflicts of interest between parties involved in said agreements also falls under this category.

Counterfeit merchandise is a violation of intellectual property rights and a common practice in sport. It refers to the manufacturing and selling of merchandise and sporting and non-sporting goods that are 'branded' using intellectual property (brand, logos, colours, etc) without authorisation.

Stadia building 'tricks' is a practice often encountered before the hosting of an international sporting event, when the need for major infrastructure projects exists. *Stadia building 'tricks'* include, among others, the zoning of land in urban and non-urban spaces, the selection and payment of construction contractors and the commercial agreements for the re-use of stadia following the initial sporting events.

Player transfers 'tricks' refer to actions taken either before transferring an athlete, or in order for an athlete's contract to be dissolved. These 'tricks' often include the involvement of player intermediaries or agents and can entail unregistered payments, the refusal of making registered payments for money owned and even threats of physical violence.

Governance selection 'tricks' refer to the nomination and selection process of the individuals employed in key roles within the sport industry. This category is closely linked to bribery and nepotism, with a number of high profile cases reported in the international federations of sport such as FIFA. These 'tricks' can also include vote rigging and illegal information sharing in order to influence the voting decision to be made.

4.0 International initiatives

4.1 Introduction

Maintaining the principles of integrity of competition has become a key priority for international bodies, national and European sport federations and governments alike. This section outlines some particular European and international initiatives currently focused on tackling corruption in sport. Such initiatives are relevant in understanding how the EU can best focus its efforts and add value in tackling corruption.

4.2 Specific international initiatives

The intergovernmental level

The Council of Europe (2014) Convention on the Manipulation of Sports Competitions was introduced as a multilateral treaty to prevent, detect, and punish match fixing in sport. This convention is the first legally binding international tool to fight match fixing for the states that choose to ratify it. As of June 2018, 29 of the Council of Europe's 47 member states had signed it and three had ratified. Two more ratifications are needed for its entry into force, and this is expected to happen imminently. Almost all EU member states have expressed their intention to sign it and many have already become compliant with its objectives and principles.

Since 2017, the Council of Europe has also taken the lead on an International Partnership against Corruption in Sport. The multi-stakeholder platform encompassing the OECD, UNODC and the Commonwealth works "to bring together international sports organisations, governments, inter-governmental organisations, and other relevant stakeholders to strengthen and support efforts to eliminate corruption and promote a culture of good governance in and around sport" (Council of Europe, 2017).

International athletic associations

In parallel, international athletic associations and sports associations more generally, often integrate special sub-units to uphold the integrity of sport. Notably, the International Olympic Committee (IOC) unit on the Prevention of the Manipulation of Competitions enforces a three-pillar strategy to promote "clean" sport. This includes regulation and legislation, awareness raising and capacity building and intelligence and investigations. IOC's International Forum for Sports Integrity (IFSI) further promotes multi-stakeholder collaborations on the protection of clean sports, bringing together representatives of governments, international organisations, international and national sports organisations, betting entities and experts.

Global Civil Society Efforts

Several prominent global civil society organisations further aim to mobilise wider audiences in the fight against corruption by connecting the sports community to the wider movement against corruption. By example, Transparency International's 'Corruption in Sport Initiative' includes a broad partnerships across experts, supporters and sponsors focused on generating research, analysis, dialogue and key recommendations (Transparency International, 2016b).

International police and security organisations

Leading international organs on security are also active in promoting anti-corruption in sports. By example, innovative actions in preventative learning have been established by both the International Centre for Sport Security (ICSS) and Interpol's Integrity in Sport Unit. To ensure good governance, integrity, and safety in sport, ICCS's "Insight" initiative includes strategic advice regarding integrity and good governance and policy development, investigations and intelligence, training and education of sports stakeholders.

Similarly, Interpol offers global training and education with a focus on competition manipulation as well as irregular and illegal betting. The initiative aims to educate and train key actors in sport on how to recognize, resist and report attempts to corrupt or fix matches and better prepare law enforcement on how to investigate and cooperate in cases related to corruption or match-fixing. It also trains sports fact finders on how to initiate and carry out an internal inquiry into suspected manipulation of competitions and prepares sport trainers on how to deliver awareness-raising sessions to their clubs. Alongside a number of other institutions and sports organisations, Interpol also offers integrity in Sport e-learning programmes.

International sports federation for individual sports

In addition to e-learning programs, a prevalent initiative among international sports federations for individual sports (e.g. football, basketball, tennis) involves online e-reporting platforms. Most prominently, FIFA has launched a confidential reporting platform, abbreviated CRP. Through the CRP, individuals can report any form or knowledge of potential match manipulation or corruption. Reports can be submitted anonymously and an external provider specialising in secure and confidential handling of sensitive information administers the mechanism. Similarly, the International Boxing Association (AIBA) has established an 'integrity hotline'.

Another common practice to promote clean sport and good governance on the part of international sports federations is the establishment of a general Code of Ethics (e.g. FIFA, the International Cycling Union, the International Boxing Association) and/or an Integrity Code of Conduct (e.g. UEFA, the International Association of Athletics Federations, the International Tennis Federation, International Basketball Federation). Such Codes typically lay out what conduct is considered to be a violation covering betting, manipulation of competitions, inside information and failure to report/cooperate, as well as corresponding disciplinary procedures.

Monitoring tools and practices

Given the proliferation of corruption practices that are difficult to detect, monitoring practices are becoming increasingly important. Within this context, the International Cycling Union (ICU) has developed an Athlete Biological Passport (ABP). The ABP is an individual, electronic record for each rider, in which the results of all doping tests collected in the framework of this programme over a period of time are collated.

To better monitor suspicious activities, fraud detection systems are also becoming an increasingly integral part of efforts to tackle corruption by international sports federations. To this end, as part of the new 2018 deal with Sportradar (a sports betting solutions provider) the International Tennis Federation has launched a new fraud detection system, designed to monitor betting patterns across more than 50,000 ITF Pro Circuit tennis matches. UEFA also operates a Sportradar betting fraud detection system (BFDS), which monitors and analyses betting activities on about 32,000 matches in Europe each year.

National anti-corruption legislation

To tackle the issue of corruption in sport, there is also a growing demand for specific legislative and policy responses at national level. A European report showed that some EU nations (Bulgaria, Cyprus, Italy, Malta and Poland) have passed specific anti-corruption laws to address match-fixing and other forms of corruption in sport (KEA, 2012). Since then, our 2018 mapping exercise suggests that Latvia, with its 2018 amended Sport's law, has followed suit. Most EU countries employ existing fraud or anti-corruption legislation, however, and a few rely on conspiracy offences (KEA, 2012).

5.0 Evidence on prevalence of corruption in sport

5.1 Introduction

This section brings together empirical evidence of the prevalence of different types of corruption across the EU and specific risks and areas in need of attention. The analysis in the section draws on a rapid literature review and the mapping review undertaken for this study to identify reported cases of corruption in the sample countries.

5.2 The prevalence of corruption in sport across the EU

A growing body of literature on corruption in sport has primarily focused on examining the prevalence of specific types of corruption or emerging trends and patterns of corruption in particular sports (e.g. Aquilina and Chetcuti, 2014; Buraimo, B., Migali, G., & Simmons, R., 2016, Forrest, 2012; Hill, 2009, 2010; Nowy and Breuer, 2017). The vast majority of sources identified for this review have focused exclusively on match-fixing or doping. Similarly, a majority of studies have focused on football, while only a smaller amount of those identified for the review have considered other sports (e.g. tennis, basketball, cycling). The limited coverage of different types of corruption in the literature is often attributed to the difficulty in defining and delimitating sport corruption itself, which ultimately affects the quality of available empirical evidence (Brooks, Aleem and Button, 2013).

Scale of the problem in Europe

Despite a scarcity of empirical research on overall rates of corruption in sport, evidence from the rapid review suggests a relatively high concentration of corruption issues in Europe compared to the rest of the world. It is widely accepted in the literature that sporting competitions in Europe need to be particularly alert to corruption risks given the global success and coverage of sporting events organised there (Andreff, 2016; Forrest, 2012; Gorse and Chadwick, 2011). An inventory of cases ranked by continent recently identified Europe as the geographical region with the highest rates of sport manipulation (Sorbonne and ICSS, 2014). A statistical analysis of 2,089 cases of corruption in sport, provided by Gorse and Chadwick (2011) showed that, relative to all continents, Europe had both the highest levels of doping (922) and match-fixing (30) cases. Overall the (2011) study covered a database of match-fixing (betting related), match-fixing (non-betting related), misuse of 'inside information' for betting purposes, and doping cases.

The data analysis offered the following key points:

- Of the 2,089 cases collated, 95.64% were doping cases, with 76.58% of those cases occurring in Europe and North America;
- Of the 1,998 doping cases analysed, more than 80% of these cases occurred in athletics, cycling and American sports;
- 2.73% of cases collated were examples of match-fixing (betting and non-betting related) with;
- 1.63% of the cases being examples of the misuse of inside information for betting purposes;
- Of the 57 match-fixing cases analysed (betting and non-betting related), 85.96% took place in Europe (52.63%) and Asia (33.33%);
- Majority of cases (70%) that occurred in Europe over the given time period (2000-2010) were in football;

- 57.89% of match-fixing cases in sport are examples of matches fixed to defraud betting operators (this includes both licensed and unlicensed operators); non-betting related match-fixing occurred in 42.11% of cases;
- The ratio of doping to match-fixing cases equates to 35:1;
- The ratio of doping to betting related match-fixing cases equates to 60:1;

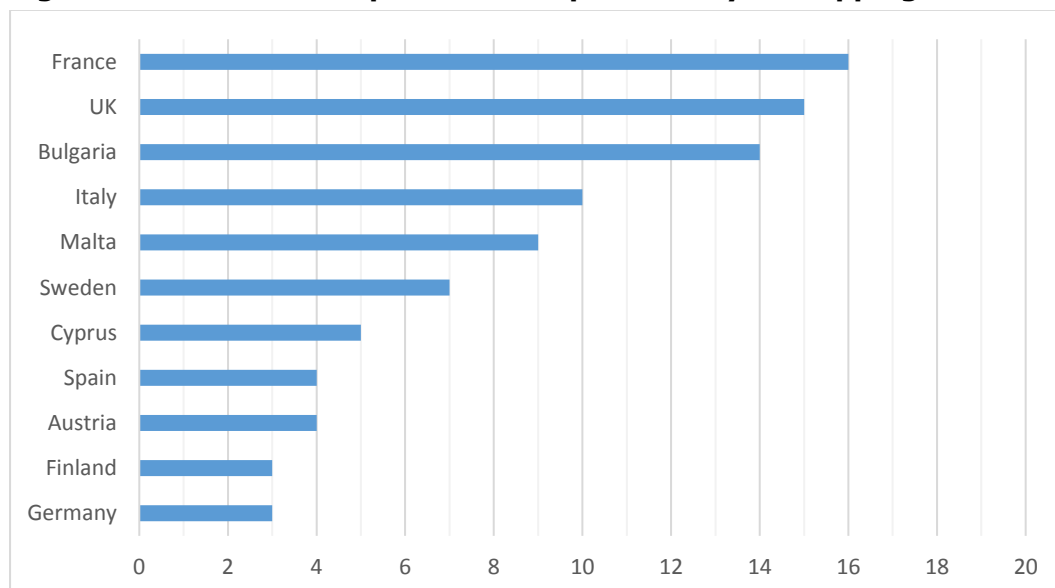
The study documented 936 cases of doping in Europe, accounting for a substantially higher rate than other continents, including North America (600 cases). Cycling and athletics were found to be the sports most affected by doping in Europe, while North America primarily experienced doping in American sports (i.e. baseball, American football, basketball and ice hockey). The analysis further indicated that doping was relatively less prevalent in football compared to match fixing.

It is also clear from the data collected that match-fixing is more prevalent in certain sports, with football, and horseracing accounting for the majority of betting related match-fixing followed by tennis. The highest rates of betting-related match-fixing in Europe were found in the UK (4 cases), Italy (3 cases) and Germany (2 cases).

The desk-based research undertaken for this study identified a total of 92 cases in the 11 sample countries since 2010. It is important to note the limitations of this research which was necessarily limited by time and resources but also a lack of consistent data. Lists of specific cases are generally not listed on government or other authority websites. Specific cases were generally identified by finding information in media sources then cross-referencing with official bodies' websites.

The most cases were identified in France (16 cases) and the UK (15), followed by Bulgaria (14) and Italy (10). Looking specifically at France which had the largest number of reported cases, most cases (5) were from 2016, while three were reported in 2017 and only two in 2018. The least cases of corruption in sports were reported in Germany (3 cases) and Finland (3 cases).

Figure 5.1 Number of reported cases per country in mapping research



Source: Ecorys research

Match-fixing

A greater number of studies have focused on trends in the prevalence of match-fixing, specifically with a number of scholars expressing concerns regarding its proliferation (e.g. Claramunt, 2018; Deutscher, Diman and Humphreys, 2017).

According to Carpenter (2014), there has been a significant increase in the number of cases of European match fixing in recent years, which he attributes primarily to two factors: the proliferation of different types of betting and the development of a large market for illegal liquid betting in Europe. Carpenter subsequently provides a review of cases involving match fixing that have gone to the Court of Arbitration for Sport within the timeframe 2009-14, encompassing: *FK Pobeda, Alexandar Zabrcanec, Nikolae Zdraveski v. UEFA* (CAS 2009/A/192), *FC Carpaty and FC Metalist v Football Federation of Ukraine* (unreported, 2 August 2013), *Bestiktas Jinnastik Kulübü v UEFA* (CAS 2013/A/3258), *Fenerbache Spor Kulübü v UEFA* (CAS 2013/A/3256) and *Eskisehispor Kulübü v UEFA* (CAS 2014/A/3628).

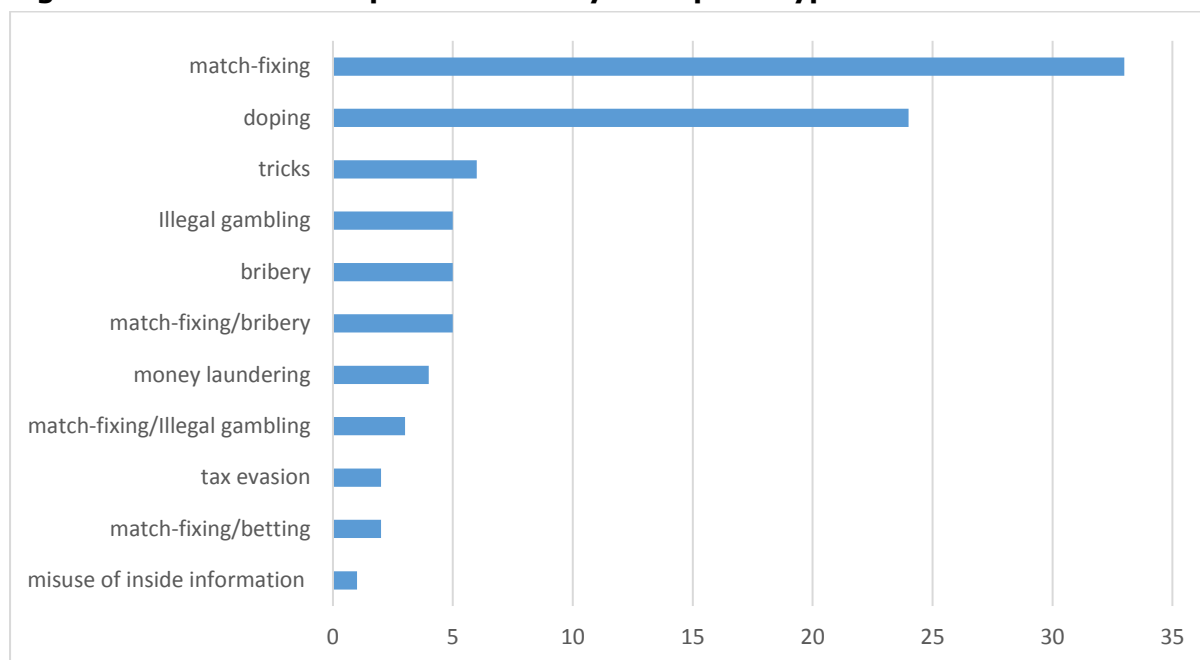
Notably, a survey on match fixing was conducted in Eastern European countries in 2012 with almost 3,000 players from 15 different countries answering the questionnaire (Fifpro, 2012). The results showed that about 24% of the players thought that match-fixing had occurred in their national competition and 12% had been approached to take part in manipulation themselves. In the same year, a Belgian social network site for football players conducted a survey in which 945 amateur football players participated. It revealed that 14.5% of the players had been approached and that one in four of the approached had agreed to take part in manipulation of matches (Zamante, 2012). More than a third of the respondents claimed to know players and coaches who had been approached by match-fixers.

Similarly, Bozkurt (2012) who performed a general analysis of match-fixing in European football contests using third-party data and found that 20 out of 28 current EU member states had experienced match-fixing scandals in the past. The list includes the following countries: Austria, Belgium, Bulgaria, Croatia, Cyprus, the Czech Republic, Estonia, Finland, France, Germany, Greece, Hungary, Italy, Latvia, Malta, Poland, Portugal, Slovenia, Spain and the United Kingdom. Furthermore, as Bozkurt's analysis relies on third-party data from national sources on official cases that have taken place or are ongoing, it is wise to highlight the limitations of the final list of countries. Based on the observation that match-fixing activities have been subject to irregular monitoring in the past, given the difficulty in detecting irregular betting patterns, it can be expected that activities occurred in other European countries not detected by authorities and hence not identified by Bozkurt's analysis.

Supplementing Bozkurt's list, our 2018 call for evidence reveals that several of the countries not identified in the (2012) analysis have since been involved in public cases of match-fixing. By example, a Swedish district court found six men guilty of interference in match-fixing in a division 1 club in southern Sweden in 2016. The same year, Romania's football federation (FRF) suspended three coaches and 14 second division players due to match-fixing allegations. The Romanian federation consequently fined each of the three coaches 200,000 lei (€42,885), and fined the players between 10,000 (€2 129) and 50,000 (€10 643) lei. As recently as July 2018, Slovakian police also arrested 20 referees and football club officials over match fixing.

Based on the mapping research for this study, figure 5.2 shows the total number of cases for each type of corruption reported since 2010. Overall, eight different types of corruption were identified across the countries that were the focus of the reviews. Some cases involved a combination of two types of corruption e.g. there were two cases of match-fixing and betting, five cases of match-fixing and bribery, 3 cases of match-fixing and illegal gambling. The most of the single type cases involved match-fixing (32 cases) and doping (24). On the other hand, only one case was related to misuse of information (UK).

Figure 5.2 Number of reported cases by corruption type



Source: Ecorys research

Match-fixing was found to be the most common type of corruption across all countries and in many cases there is evidence that cases are driven by another form of corruption such as bribery or illegal gambling. For example, we found two Italian cases of match-fixing scandals in football which involved illegal betting. The Italian Football Federation responded to both cases with disciplinary actions. The punishments included the deduction of points, as well as the ban of certain individuals from football activities. Another three recent cases from the UK, Finland and Malta demonstrated the connection between match-fixing and bribery. Individuals involved in these cases were accused of accepting bribes in order to affect the outcomes of matches. As a result, they were suspended from football for several years, some of them were arrested. In the Finnish case, the bribes were worth of more than \$750,000 and consequently several people were arrested.

In Bulgaria and Cyprus, we found three cases linked to match-fixing and illegal betting. The Cyprus government re-opened a football corruption case from 2011 due to suspicions that the original accusations were not handled accordingly. The original case included nine highly suspicious matches that UEFA had notified to the Cyprus Football Association. In the Bulgarian case from 2014 which was reported by the press of Ministry of Interior, nine people have been detained including some footballers. Further examples are highlighted in the boxes below.

Life bans for four Hamrun Spartans team members accused of match-fixing in Malta

Former Hamrun Spartans players Roderick Fenech and Massimo Grima were banned from football for life after being found guilty of match-fixing. Fenech and Grima had been suspended indefinitely since July 2013 when the match-fixing allegations surfaced. The case goes back to the 2012-13 season. Along with Elton Borg and Julian Friggieri, two former members of the Hamrun Spartans FC committee, Fenech and Grima were accused of colluding to fix matches. Borg and Friggieri admitted the charges and voluntarily barred themselves from all football-related activities. A few months later, the Malta FA Council imposed life bans on the two disgraced officials. Fenech and Grima were accused of approaching Andrea Cassar, the former Hamrun goalkeeper, to manipulate the game between Hamrun and Hibs in January 2013. They were also

charged with fixing the match between Hamrun and Birkirkara, in February 2013. Fenech was also accused of failing to report that he and Gianluca Calabretta had been approached by Friggieri and Borg to fix the game between Hamrun and Balzan Youths in 2012.

German tennis player suspended and fined for betting

A 23-year old German tennis player Luca Gelhardt was found to have placed 280 bets on tennis matches between 2012 and 2015. An investigation led by the Tennis Integrity Unit found that the player placed bets on tennis matches through three online gambling accounts. After being found guilty of betting on tennis matches, the tennis player has been suspended for eight months and fined \$7,000. Half of the suspension (four months) and half of the fine (\$3,500) are suspended on provision that no further breaches of the Tennis Anti-Corruption Program (TACP) are committed prior to 16 April 2019. On that basis, Mr Gelhardt was immediately prohibited from playing in or attending any sanctioned events organised or recognised by the governing bodies of the sport.

Doping

Gorse and Chadwick's (2011) study indicates that, globally, the number of cases of proven match-fixing (57) in the period 2000-10 was far outweighed by the number of proven doping cases (1,998 cases). According to the authors, a proven case of doping was sixty times more likely than betting related match-fixing within this timeframe. According to a recent study commissioned by the World Anti-Doping Agency (WADA), up to 45% of athletes competing at two 2011 international championships⁵, claimed to have taken performance-enhancing drugs in the previous 12 months (Ulrich et al., 2017). To estimate the prevalence of doping, the researchers utilised a "randomised response technique," which guarantees anonymity for individuals when answering a sensitive question. The estimated prevalence of doping usage within the past 12 months of up to 45% among participating athletes, starkly contrasts with the prevalence detected by blood and urine tests taken by WADA during the two championships (between 0.5% - 3.6%). The findings therefore call into question the efficiency of current anti-doping detection by accentuating the discrepancy between positive drug tests and anonymous admissions. Upon review of secondary data, De Hon, Kuipers and van Bottenburg (2014) corroborate the assertion that the prevalence figure can be expected to be far higher than the average of 1-3% of athletes who are caught with doping substances, or their metabolites, in their system. De Hon et al. estimate that the prevalence of doping in elite sports is likely to be between 14% and 39%, while underlining that this figure can differ widely in various sub-groups of athletes.

Operation Puerto – Spanish anti-doping investigation in cycling

A doping network established by the doctor Eufemiano Fuentes involved top-level international cyclists (such as Alejandro Valverde and Jan Ullrich). Mr Fuentes provided doping and clean blood samples to the cyclists in a collaboration with a physical trainer Jose Ignacio Labarta. The case was discovered in February 2006 when it was reported that there is a supply of a doping products to a high-level athletes. The investigation led to the apartment in the centre of Madrid where the hidden laboratory was. The

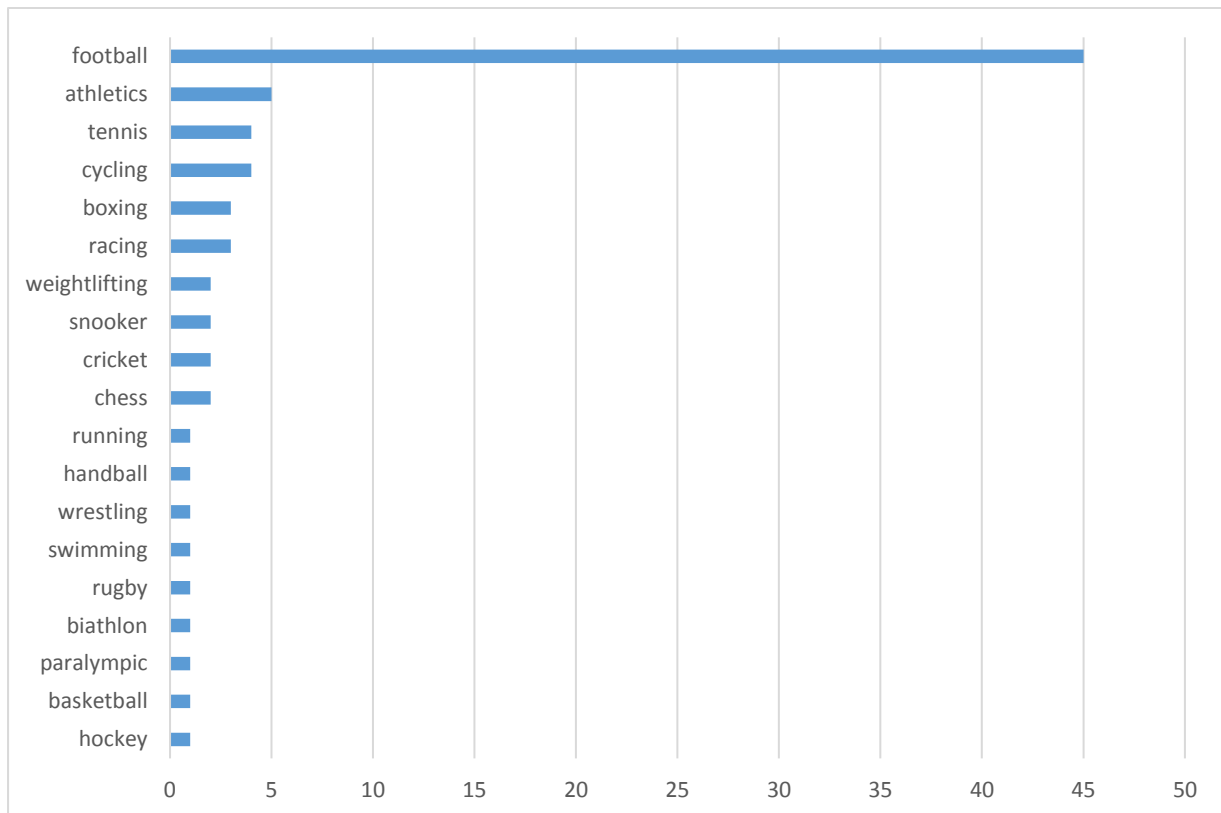
⁵ The 2011 World Championships in Daegu, South Korea, and the 2011 Pan-Arab Games held in Doha, Qatar.

investigators found more than 100 bags of frozen blood and blood plasma with acronyms and codes linked to the cyclists. There were also documents related to the doping practices, training plans and equipment for blood freezing. The Madrid court was directing the investigation which went on until 2016 when the final conclusions were presented. Several people involved in the doping network including doctor Fuentes and the trainer Labarta were jailed.

Cases by sport

Figure 5.3 presents the breakdown of reported cases by sport. More than 19 different sports in total were covered in the 92 identified cases. The sport with most cases identified was football with 47 cases across 11 countries. Most of the football cases were reported in France (7) and Italy (7), Malta (5), Bulgaria (5) and the UK (5). Athletics, tennis and cycling had the next highest numbers of cases. Only one case of corruption was found in sports such as hockey, basketball, biathlon, Paralympic, swimming and running.

Figure 5.3 Reported cases by sport

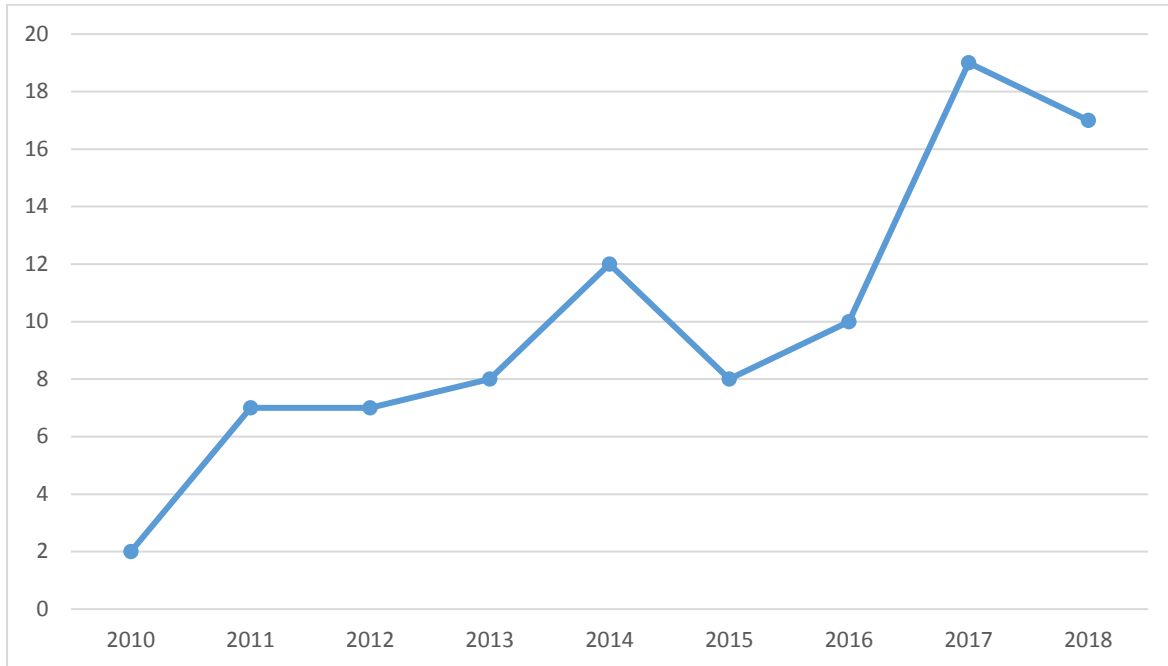


Source: Ecorys research

Reported cases over time

Figure 5.4 shows the number of cases reported over the time since 2010 up to 2018 (the period covered by the mapping review for this study). Overall, the review shows an increasing trend. In 2010, only two cases were found (one in Spain, one in the UK) compared to 2018 when 17 cases were reported across eight countries (Austria, Bulgaria, France, Germany, Italy, Malta, Spain, UK). An important caveat here is that may be easier to identify more recent cases using a desk-based mapping approach such as this.

Figure 5.4 Reported cases over time



Source: Ecorys research

Other forms of corruption

The rapid literature review for this study has shown that the more detailed empirical studies of corruption in the EU tend to focus on the prevalence of doping and match-fixing cases. The mapping review completed for this study has revealed very few examples of other types of corruption across the EU. This does not mean that other types of corruption do not exist as such cases may be more difficult to detect through a mapping exercise reliant on a rapid research approach. The lack of reporting may perpetuate the problem however allowing the sport industry to become a fertile ground for less familiar practices to manifest. A less typical type of corruption identified through the mapping was money laundering. An example is provided below.

The Bulgarian chess federation

The Youth and Sport Ministry in Bulgaria is leading a comprehensive check of the funding and competitions directed by the Bulgarian Chess Federation in the period 2011 – 2014. Information provided by the European Chess Union (EAS) and the World Chess Federation (FIDE), as well as the decision of the Sports Court of Arbitration in Lausanne in May 2017 suggested money laundering was occurring in the Bulgarian Chess Federation. It was found that an offshore company registered in Delaware, which is called the European Chess Union, transferred the money, which was translated as a fee by the Bulgarian state, to an account in Slovenia. According to the available documents for the period 2011-2014, €1.1m was paid into the counterfeit account. The Minister of Youth and Sports announced that he would address Chief Prosecutor Sotir Tsatsarov for assistance in establishing the scale of the abuse.

A further case identified was that the financial accounts of AC Milan are currently being investigated in order for potential money laundering accusations to be answered. The club has changed ownership twice in the past few years.

The Financial Action Task Force (2009) investigated the prevalence of money laundering activities in football. A survey for the investigation identified over twenty cases of money laundering through the football sector, ranging from simple cases of smuggling large amounts of cash that seem to be derived from illegal transactions, to complex international money laundering cases.

This review has also highlighted cases of the misuse of 'inside information':

- A footballer from the top division in Denmark placed a bet that his team would lose an away match against one of the top teams. The football club informed the Danish Football Association (DBU) of the matter, and the player was issued with an eight-day game ban (six for betting on his own match and two for lying to the DBU).⁶
- Similarly, two recent cases (both in the United Kingdom) involved players, who were not playing in a particular match for their teams, and knew details of team selection issues (injuries and team sheets) betting on their teams to lose.

The above cases are not classed as match-fixing as there is no evidence that actions unfairly influenced the outcome of a sporting contest, however, the actions were able to undermine the integrity of the betting product as players used their inside knowledge.

The review also identified the following example of player transfer tricks:

- Chievo and Cesena football clubs were found to be involved in an agreement that allowed them to buy and sell 30 players with the cost of the transfer inflated up to 90 times. Points were deducted by both teams in light of the scandal.

5.3 Evidence on the drivers of corruption and risks

The sport sector's increased exposure to corruption has been attributed to a number of factors categorised as de-amateurisation, medicalisation, politicisation and commercialisation of sports (Claramunt, 2018; Masters, 2017; Paoli and Donati, 2013; Simon, 2004). This section provides a brief overview of recent research addressing the drivers of match-fixing and doping cases.

Match-fixing

Despite a steady growth in knowledge about match-fixing as illustrated above, there is still an overall lack of systematic empirical evidence relating to causes and risks. Previous research on the risks associated with certain sports betting types necessarily had to rely on theoretical risk analysis, consultations with stakeholders (with the obvious disadvantage that information presented by stakeholders is often self-interested), and/or anecdotal evidence on match fixing incidents reported in the media (Van Rompuy, 2015).

In an attempt to address this gap in the evidence, Spapens and Olfers' (2015) paper describes the results of an empirical study of match-fixing in the Netherlands and analyses the main risk factors involved. The paper highlights social relations of persons involved in sports with criminals, the availability of the game for betting, financial difficulties of clubs and players, alongside gambling addictions as areas in particular need of attention.

⁶ The total bet amounted to DKK 6,500 at a local filling station, and three of his 13 bets were on his own future matches. The filling station attendant brought the matter to the attention of the footballer's club (For more information, see: <https://www.lotteriinspektionen.se/globalassets/dokument/informationsdokument/rapport-matchfixing-in-the-nordic-countries-2013.pdf>)

Furthermore, Van Rompuy (2015) outlines three betting trends that are likely to increase the risk of betting-related match fixing:

- Firstly, betting formulas that are weakly correlated to the final outcome of a match, in particular side bets (i.e. bets on a specific subset of a game, such as number of corners, team to kick-off the match, who will score the next goal, and which player will get a yellow card)
- Live betting, i.e. the possibility of betting in real-time during the course of a match (also known as in-play betting or in-the-run betting). A frequently raised argument is that this type of betting, which has been a key driver of online sports betting revenues in recent years, poses specific risks because fixers can take advantage of the higher betting limits and variations in the odds to maximise profits
- Betting on certain types of sports events that, so the argument goes, are particularly vulnerable to manipulation such as games where little is at stake in sporting terms (e.g. friendly matches), matches in lower leagues, amateur competitions or events involving minors (youth competitions).

Here, a number of studies have also highlighted that betting syndicates based in Asia are instigating a substantial number of cases of match fixing in Europe (Forrest, 2012, Spapens and Olfers, 2015; Transparency International, 2016). The threat to European sport arises primarily from two features of Asian markets: high levels of betting liquidity and the weakness of the regulatory frameworks. In this context, Iris (2012) estimates that bets of €200,000 to €300,000 could be placed on a Belgian second division football match through agents without risk of attracting attention and without driving changes in odds.

Five jockeys and two owners face 'serious' BHA charges in the UK

The British Horseracing Authority (BHA) charged 13 individuals, including five jockeys and two owners, with “serious breaches” of the rules of racing in relation to 10 races between January and August 2009. The charges were part of a multi-million pound betting scandal and each of the jockeys received £5,000 for each race from criminal gangs who bet on them not to win. After an 11-day hearing, the BHA announced that 11 individuals of the 13 were guilty of a range of offences. They were banned them for periods ranging between 6 months, 12 years (which means the end of the jockey’s career), and 14 years for the owners implicated (who were said to be the instigators). The scale and complexity of the case was unprecedented in the history of the BHA. It was one of the biggest sports corruption cases to come before a national governing body in the United Kingdom.

It is argued that high liquidity in the betting market when contrasted with modest incomes among players and officials in European lower-tier competitions increases the risk of manipulation (Forrest, 2012; Aquilina and Chetcutiby). Substantiating this observation that matches in lower leagues are more vulnerable to match-fixing, Nowy and Breuer’s (2017) study concludes that match-fixing is a particularly serious organisational problem for the grassroots of football in Europe. Aquilina and Chetcutiby (2014) adds that the familiarity between players and administrators in the football circles creates an additional level of risk at local levels.

Pitsch, Emrich and Pierdzioch (2015), further demonstrated that match-fixing is prevalent at lower levels by applying Randomized-Response-Techniques to German amateur football. The authors report that around one third of the investigated players have been confronted with match-fixing incidents during their active career while close to 15% have actively engaged in match-fixing. The lack of monitoring of the sports event at lower levels could further increase the opportunity for manipulation of sports outcomes because the chance of being discovered is lower than with closely-monitored events. (Joint Nordic working group to chart match-fixing in the Nordic region, 2013).

Doping

Various research studies have shown that as the stakes of the competition increases, so does the prevalence of doping (Gilpatric, 2011; Ryvkin, 2013). Within this framework, a noteworthy finding from Gorse and Chadwick's (2011) evaluation is the observation that doping was far more prevalent in category A (elite level) sports than betting related match fixing, with the latter predominantly confined to lower leagues and sporting events (category B).

There is also evidence to support varying risks of doping across different sports. For example, Lazuras and Rodafinos (2010) in their analysis of the use of performance enhancing substances in a cohort of 750 Greek elite athletes concluded that the use of banned drugs was significantly more common in individual sports (14.4%) than in team sports (7.0%). Similarly, in a study by Peretti-Watel, Pruvost and Guagliardo (2005), surveying 996 young elite athletes, positive attitudes towards doping was observed as more prevalent among those practicing an individual sport (e.g. athletics or cycling) without frequent contact with other athletes.

Different studies have also highlighted the importance of social environments in individual athletes' decisions to use banned substances (Dunn and Swift, 2012; Breivik, Hanstad and Loland, 2009). Corroborating this view, Erdman, Fung and Doyle-Baker, in a sample of 582 high-performance athletes, indicated that the most common sources of information on the use of performing enhancing substances were family/friends (52.7 %), teammates (44.3 %), and coaches (40.7%).

Similar results were obtained in a study by Kim, Kang and Jun (2011) of Olympic athletes, where the most common sources of information were found to be parents (36%) and coaches (35%). Furthermore, in a study by Peters, Schulz and Oberhoffer (2009) 25% of elite athletes (n = 1,757) stated that their coach was the first contact for doping issues. Accordingly, Morente-Sanchez and Zabala (2013) highlight the importance of educating the people surrounding athletes, and not only the athletes themselves, as they are often the most influential.

Money laundering

A Financial Action Task Force (2009) study on money laundering activities in football highlighted a variety of money flows involving various financial transactions that increase the risk of money laundering. Two particular risk categories are highlighted as follows:

- Ownership of football clubs: Investments in football clubs can be used to integrate money of illegal origin into the financial system, akin to investment of crime proceeds in real estate. Football clubs are seen by criminals as an effective vehicle for money laundering as there can be a lack of transparency on the source of investments in football clubs.
- The transfer market and ownership of players: risks of money laundering are connected with lack of transparency in relation to the funding for certain transfer transactions and the opportunity for funds to be paid offshore with limited disclosure requirements regarding beneficial ownership of destination accounts.

6.0 Analysis of governmental responses

6.1 Introduction

This section summarises the main findings from the reviews of governmental responses in the 11 sample countries. The country reviews aimed to identify how corruption in sport has been addressed at the member state level through policies, initiatives and legal developments. The review has identified 85 different national responses to corruption in sport in the selected countries. Many of these responses are detailed while more detailed case studies are presented in boxes.

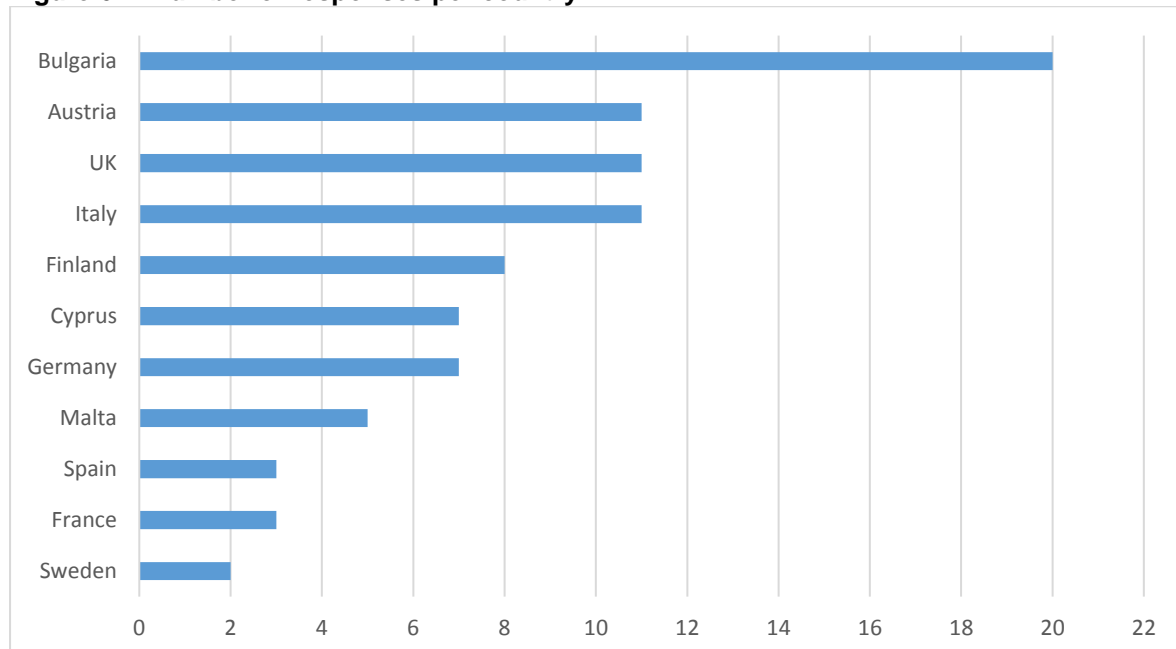
6.2 Types of responses

This section provides analysis and examples in relation to four main types of responses in the fight against corruption:

- Legal measures implemented by national governments;
- Preventative measures;
- New organisational structures;
- Collaborative mechanisms.

The mapping research based on the 11 sample countries identified 88 different responses to the problem of sport corruption. Figure 6.1 shows the number of responses identified per country.

Figure 6.1 Number of responses per country



Source: *Ecorys mapping*

Legal measures implemented by national governments

Many of the responses addressing corruption in sport in the reviewed countries are implemented by government through ministries of justice, education, sport or social affairs and parliament, in the form of legal amendments. Examples identified in the mapping include:

- The Bulgarian Parliament introduced in 2011 a new chapter within the Bulgarian Criminal Code⁷, which directly addresses sports crimes, such as general bribing and match-fixing practices. Case study 1 below provides analysis on the impact of these legal changes.
- The New Gaming Act in Malta (2018) aims to strengthen the player protection framework by formalising the role of the Maltese Gaming Authority's (MGA's) Player Support Unit as a mediator between aggrieved players and operators. The new Act also envisages new and more effective processes for criminal and administrative justice. Another important area of focus includes reporting of suspicious sports betting transactions in the fight against the manipulation of sports competitions.
- In Spain, the Laws 5/2010 and 1/2015 have amended the article 286bis of the Criminal Code, which included all the corruption crimes relating to the private sector, distinguishing between active and passive types of corruption. As a result of these amendments, a sub-paragraph has been added that specifically introduces sport corruption crimes, namely crimes relating to conducts that aim to deliberately and fraudulently predetermine or alter the results of a sporting event, match or competition of special relevance in economic or sporting terms.
- In Italy, a specific law on sport fraud, Law 401/1989, was introduced in order for illegal betting and the protection of the running of competitions to be separated from the previously existing criminal law. This key law criminalised match-fixing.
- In Germany in 2017 additions were made to the Criminal code (Strafgesetzbuch (StGB) Article 265c Sportwettbetrug (betting fraud in sport) und 265d Manipulation von berufssportlichen Wettbewerben (manipulation in professional sport competitions). This is the main German law against match fixing and betting fraud. The law makes it a crime to conspire to fix sporting events and sets out prison sentences of up to three years for any player, coach or referee found guilty of match fixing. In particularly serious cases, courts may hand out sentences of up to five years.
- In response to allegations of nepotism, bribery and fraud, all associated to fixing the results of sporting competitions, the Cyprus Sport Organisation Law amended Article 24 of the Law 41/69, criminalising bribery, nepotism and fraud in relation to manipulating the result of a sporting match. An additional law was introduced in 2017, Law 180(I)/2017, according to which imprisonment and hefty fines are decided as penalties for people found involved in match manipulation, as well as for sport stakeholders who are involved in betting activities.

Case study 1 – Legal amendments in the Bulgarian Criminal Code concerning match-fixing

Lead organisation	Bulgarian Government
Key focus/objectives	Legal ground provisions for prosecuting cases of match-fixing (Chapter Eight "a" SPORTS CRIMES, Article 307)
Member State(s)	Bulgaria
Period	Legal amendments adopted in 2011
Programme funding	NA

Aims and approach

In Bulgaria, corruption in sport and more specifically match-fixing and illegal gambling are considered to be tightly linked with money laundering and other illegal activities of criminal networks. Match-fixing was identified also as one of the two major issues

⁷ Bulgarian Criminal Code, Chapter 8: Sports Crimes.

encountered by the Bulgarian professional football players in research, conducted by FIFPro in 2012.⁸ According to the survey, 13.2% had been approached to consider fixing the result of a match, which equates to an average of three of the 22 players on the field for every game.

As match-fixing was one of the most serious recurring problems of corruption in sport in Bulgaria, the Bulgarian Parliament took legal actions to embed provisions in the legislative framework to establish the grounds on which the issue could be tackled. In 2011, the Bulgarian Parliament implemented several legal amendments to the Bulgarian Criminal Code under *Chapter Eight, Sports Crimes section* with focus on sports and corruption.⁹ The amendments included *Article 307 (b), (c), (d), (e), (f)*, increasing the penalties in cases of influencing sport games results.

According to the legal amendments, a penalty is imposed not only on the party offering the benefit but also on the party who “*accepts an offer or promise for a benefit*” (Article 307c)¹⁰. This has further established responsibility for the athletes and/ or sport clubs who participate in match-fixing by accepting a bribe or an offer for such. Experts claim that before implementing these changes, there had not been any legal grounds in Bulgaria on which match-fixing could be prosecuted.¹¹

Outcomes and learning points

Reports by Bulgarian media as well as information shared by the Ministry of Youth and Sports in Bulgaria reveal that in the period between 2012 and 2018, effective verdicts were issued on the legal grounds of Art. 307 of the Bulgarian Criminal Code. Article 307 is often combined with Article 327 in the same Code, as the latter refers to organising illegal “*game of chance*”, for which the punishment could extend to “*deprivation of liberty for one to eight years*”¹².

In 2014, pre-trial proceedings for an offence under *Paragraph 307b* and *Article 321* of the Criminal Code were initiated by the Criminal Police with regard to information on the activities of a group of persons involved in the manipulation of sporting events. Football coaches and famous footballers were among the ones who were accused in the process.¹³ In 2016 three sentences were issued by the District Court of Sofia for persons who tried to fix the football game between the national teams of Bulgaria and Germany during the European football championship 2014 UEFA European Under-19 Championship held in Hungary in 2014. In 2017 the Prosecutor’s Office of Republic of Bulgaria initiated four pre-trial proceedings under Article 307 of the Criminal Code of Bulgaria. In the same year the Bulgarian Football Union stopped the coaching rights of two coaches, after a signal deposited by the Bulgarian Prosecutor's office for match-fixing attempts. After the accusations were not proven during the court proceedings,

⁸ FIFPro (2012) Black Book Eastern Europe, *The problems professional footballers encounter: research*.

⁹ Criminal Code R Bulgaria. Chapter Eight “a” SPORTS CRIMES (New, SG No. 60/2011) Article 307b (New, SG No. 60/2011). “*Anyone who by using violence, fraud, threat or by other illegal means persuades other person to influence the course or outcome of a sporting competition administered by a sporting organization shall be subject to a deprivation of liberty of one to six years and a fine from BGN 1000 to BGN 10 000 provided the act does not amount to a graver crime.*” Available at: [[Criminal Code Bulgaria](#)].

¹⁰ Criminal Code Bulgaria. Chapter Eight “a” SPORTS CRIMES (New, SG No. 60/2011) Article 307c (New, SG No. 60/2011).

¹¹ Match-fixing in sport. *A mapping of criminal law provisions in EU 27*. KEA. March 2012. Available at: [http://ec.europa.eu/assets/eac/sport/library/studies/study-sports-fraud-final-version_en.pdf].

¹² Criminal Code Bulgaria.

¹³ Дневник, 19:37, 10 December 2014, *Деветима са задържани при разследването за уредени мачове, Тунчев и Камбуров са сред тях*

the Disciplinary Commission of the Bulgarian Football Union have restored the coaching rights of the two coaches.¹⁴

Overall, according to national officials – since 2014 cases of match-fixing in Bulgaria have decreased significantly, as in the past they reached more than 50 cases per season.¹⁵ According to his statement the legal amendments in 2011 as well as the effective verdicts have resulted in decreased illegal activity in the past several years.

In 2018 there has been only one game suspected of being manipulated in the top division, second division and the elite teenage group, as stated by the Executive Director of the Bulgarian Federal Association Pavel Kolev. Nevertheless, tackling and even in some cases detecting match-fixing seems to be a difficult task as stated by Pavel Kolev due to the fact that betting is not the only reason behind match-fixing in Bulgaria, which makes it even more difficult to detect such illegal activities only based on “*monitoring report on suspicious betting activities*”¹⁶.

However, according to a recent statement made by the Bulgarian Minister of Youth Affairs and Sports - Krasen Kralev, the amendments included in the Bulgarian Criminal Code in 2011 are helpful but not sufficient on their own.¹⁷ Krasen Kralev maintains that the biggest problem in proving match-fixing is collecting evidence for such cases. In order to tackle match-fixing different stakeholders need to be involved in joint actions against illegal activities in sport. Thus, having only legal grounds and relying on judicial bodies to restore justice might not be always the most efficient way to deal with it. In light of the identified need for joint action, government bodies in Bulgaria have taken further actions to ensure the involvement of different stakeholders through the establishment of multi-stakeholder Working Group for preventing and tackling corruption in sport, which will start its work in 2019.

The reviews also show examples of new rules and regulations introduced by sport federations to tackle corruption.

- According to a study conducted by FIFPro, Cyprus ranks high in the list of the most 'fixed' football championships. At the same time, UEFA had notified the Cyprus Football Association of about 75 suspicious matches between 2011 and 2016. As a response, in November 2016 the CFA decided to change their regulations in order to allow it to sanctions clubs for match-fixing on receipt of information from UEFA. Sanctions include an initial heavy fine for a suspected first offence, followed by a points loss for a second and relegation for a third, while teams suspected of match-fixing for a fourth time would incur a lengthy ban.
- In 2016 the Cyprus Football Association amended its Rules and Guidelines on transfer of players, due to the several allegations of player transfer tricks.

Preventative measures

The reviews highlighted the prominent role played by sport federations in developing preventative measures and initiatives aimed at improving standards through codes of

¹⁴ Information provided by an expert in the Ministry of Youth and Sport in Bulgaria.

¹⁵ BgFootball, *Само един сигнал за уреден мач в професионалния футбол този сезон*, 14 February 2018. Available at [<http://bgfootball.com/new.php?id=81897>].

¹⁶ Summary Report from *Peer-to-peer learning activities for creation and/or development of a national platform and cooperation between interested Member States*, 24-25 April 2018, Varna, Bulgaria.

¹⁷ Darik News, *140 милиарда долара се изпират чрез уговаряне на мачове и незаконни залагания*, 28 April 2018. Available at [<https://dariknews.bg/regioni/varna/140-miliarda-dolara-se-izpirat-chrez-ugovariane-na-machove-i-nezakonni-zalaganiia-2092929>].

conduct or raising awareness and educating athletes and relevant stakeholders about the risks of corruption in sport. Particular examples could be found in Cyprus (Case Study 1, below), Germany, Malta and Sweden.

- The German Football League organises workshops and training courses on fair play and corruption prevention for coaches and players.
- The Bulgarian Football Union has taken some actions to fight match-fixing such as specialist training for footballer, provided by Sportradar, and a hotline to assist players in how to deal with a proposition to manipulate a game.¹⁸
- In Finland the 'Don't Fix It' campaign¹⁹ is based on the cooperation between the Finnish Ministry of Education and Culture, FIFPRO²⁰ and the Birkbeck University of London. The aim of the initiative is to implement an education programme for football players with face-to-face session and to develop a mobile app for the anonymous reporting of match-fixing cases²¹.
- In response to numerous match-fixing scandals, the Office for Sport in Italy introduced the integrated intervention programme Anti-Match-Fixing Formula that aims to act as both a data repository and a protected reporting system against match-fixing.

New organisational structures

Finally, in different countries, specific Commissions or Agencies have been established in order to address corruption practices in sport.

- Agencies to counteract doping practices in sport have been established in Germany²², France²³ and Finland.²⁴
- In Austria, the Association for Protecting the Integrity in Sport (Fair Play Code²⁵) was collectively founded in 2012 by the Austrian ministry for Sport, the Austrian Football Association and the Austrian Football League (Case Study 2). A similar organisation was established in Germany in 2011 by the German Olympic Sport Federation.²⁶
- In the United Kingdom, the Sports Gambling Commission provides quarterly reports and monitors the illegal betting issues through the work of its Sports Betting Intelligence Unit.
- In Malta a Sport Integrity Unit has recently been created as part of the bill to prevent corruption in sport. The unit is part of the Prevention of Corruption in Sport Act. It aims to collect and analyse information about suspected cases of manipulation of sports

¹⁸ Summary Report from *Peer-to-peer learning activities for creation and/or development of a national platform and cooperation between interested Member States*, 24-25 April 2018, Varna, Bulgaria.

¹⁹ <https://fifpro.org/news/don-t-fix-it-project-takes-important-next-step/en/>

²⁰ Fédération Internationale des Associations de Footballeurs Professionnels. It is the worldwide representative organisation for 65000 professional football players.
<https://fifpro.org/en/>

²¹ The mobile App Red Button allows players to report their suspicions anonymously, informs players of the likely approaches fixers take and feeds all the information back to the authorities. The app was launched in Finland in 2013 and was downloaded by 1,200 Finnish professional football players. The aim is to remove the risk involved in confronting the mafia-like groups currently engaged in football corruption.

²² National Anti-doping agency (NADA)

²³ French Anti-doping Agency (AFLD)

²⁴ Finnish Anti-doping Agency (FINADA)

²⁵ <http://www.playfaircode.at/en/>

²⁶ Deutsche Olympische Sportbund (DOSB)

events. It will act as an information hub that is the primary point of contact for the police and sports organisations as well as provide assistance to the police in criminal cases.

Case study 2 – Play Fair Code Education Strategy

Lead organisation	Association for Protecting the Integrity in Sport ("Play Fair Code")
Key focus/objectives	Prevention through education, training and awareness raising; Monitoring of match-fixing; Operating the ombudsman institution as an anonymous point of contact for the match fixing cases
Member State(s)	Austria
Period	2012 - present
Programme funding	ERASMUS+, membership fees, government funding, sponsor contributions

Aims and approach

A key instrument for tackling corruption in sport in Austria is the Association for Protecting Integrity in Sport's 'Play Fair Code'. The Association was initiated by the Austrian Ministry of Sport, the Austrian Football Association (AFA) and the Austrian Football League. Gradually it involved other key sport stakeholders together with a variety of Austrian betting providers. The 'Play Fair Code' acquires 60% of its funding from the Austrian Ministry of Sport which is supplemented by a range of sponsors and through annual membership fees.

The activities of the 'Play Fair Code' are based on the core values of the Association such as competence, commitment and sustainability. The 'Play Fair Code' consists of three essential measures:

- Prevention measures - education, training and awareness raising among the target groups;
- Monitoring measures - observation and analysis of match results;
- Facilitation of the Ombudsman office as an anonymous point of contact for athletes and various sport actors.

The main prevention mechanism is an education strategy that includes training sessions for the target groups of professional athletes, referees, association officials and media representatives. Since 2015, the training activities have been expanded to amateur sports targeting semi-professional and amateur athletes. Training courses include lectures, seminars and workshops focusing on integrity in sport and specifically on match fixing.

The trainings are conducted with athletes in an informal setting to create a trustworthy environment, for example in changing rooms. The content of the training was developed to include real-life stories and videos that athletes can relate to. Moreover, the consequences of illegal actions are explained, including criminal charges, fees and imprisonment. To ensure sustainability face-to-face trainings are provided in 12-18 months cycles at the national and international levels. Every two years new content is developed. Examples of training materials can be accessed online on the 'Play Fair Code' website.

Since 2012, the 'Play Fair Code' has linked to various ERASMUS+ projects working with national and international partners. In the past two years 'Play Fair Code' in cooperation with the Aristotle University of Thessaloniki has developed a training module on match-

fixing as part of the project 'Fix the Fixing' funded by ERASMUS+. The content of the module was developed based on the results of an international questionnaire survey conducted by the university. Another example relates to the project 'European Rookie Cup' led by the Austrian Ice Hockey League (EBEL). The ERASMUS+ project involved young ice hockey athletes who in 3 years period improved their athletic performance. In addition, the project increased awareness among ice hockey athletes in match-fixing, doping and antidiscrimination due to the involvement of Play Fair Code, the NADA Austria and the Fairplay Initiative. Recently, the 'Play Fair Code' has committed to new projects that will require their expertise in developing a training methodology and guidelines for decision makers to tackle match-fixing and betting fraud.

Outcomes and learning points

Since its inception, the educational approach providing athletes with individual training sessions can be regarded as successful. Since 2012 more than 15,000 athletes, coaches, referees, supervisors, and other sports stakeholders in 20 countries have participated in more than 500 training sessions in the areas of match-fixing and betting fraud. Most of these sessions (around 80%) were provided in Austria while 20% reached the athletes in other countries.²⁷

There is evidence that the training has improved athletes' understanding and awareness of the match-fixing issue and the consequences of their involvement. Through informal communication, athletes were provided with more information about the penalties of match-fixing that could affect their social reputation and result to criminal charges.²⁸ Based on interview evidence, the format and the content of the training including real life stories was considered to be an effective approach in engaging athletes.

Although it is difficult to evaluate the impact of the prevention measures in the sport disciplines as the evidence on the impacts is still developing, an interview conducted for this study suggests that the Play Fair Code has reached the vast majority of professionals and young athletes in the target sports. The attendance sheets are collected after every training session to calculate the number of participants reached. Thus, they provide an overview of the annual outreach. It is planned to introduce short quizzes for the participants to evaluate qualitatively if the key messages of the training were understood. Overall, it is clear that athletes have improved their knowledge of match-fixing and betting fraud.

There is a continuous support from the sport community and key stakeholders to educate athletes about corruption in sport. The initial prevention measures focused on football due to a high percentage of match-fixing cases worldwide.²⁹ However, during five years of implementation the training modules were developed in five different sport disciplines including ice hockey, basketball, handball and skiing.³⁰ From 2019, the training sessions will also be provided to the tennis federation.³¹ Since 2013, the 'Play Fair Code' has expanded cooperation among major sport federations and bet providers in Austria. Due to its success, further developments and cooperation are foreseen in the future.

In collaboration with the Austrian Federal Police dealing with intervention and investigation, the Play Fair Code acts as a national and international integrity hub. Over

²⁷ Play Fair Code (2018) Annual report 2017.

²⁸ Moritzer, S. (2016). *The Austrian approach: how to combat match-fixing and promote integrity in sport*. In: Global Corruption Report: Sport. Transparency International, Routledge: NY, 269-273.

²⁹ Ibid.

³⁰ Play Fair Code (2018). Annual report 2017. Vienna.

³¹ Based on interview evidence

the years 'Play Fair Code' has collected best practice examples and knowhow in match-fixing and betting fraud. In the near future, Austria is planning to setup a National Platform as envisaged in the Council of Europe's Convention on the Manipulation of Sports Competition. The National Platform would increase information sharing and coordination between State and non-State enforcement actors at the national and international levels in the area of sport manipulation. Due to the 'Play Fair Code' the structure and experience of the Platform are ensured.

Collaborative mechanisms

The review highlighted numerous examples of collaborative approaches in responding corruption issues:

- The National Doping Prevention Plan in Germany is a cooperation project of the Federal Ministry of the Interior (BMI), the Ministers of Sport, Ministers and Sport Referees (SMK / SRK) of the German Olympic Sports Confederation (DOSB) / the German Sports Youth (dsj) and the National Anti Doping Agency Germany (NADA), federal and local governments.
- The Swedish Sports Confederation worked in collaboration with the other Scandinavian sport federations to develop the Scandinavian Anti-Doping Convention³², which represents the only multilateral agreement that allows unlimited mutual doping tests.
- The Italian Regulatory Authority³³ established a platform in 2011 through which information between the private and the public sector are shared with regard to anomalies in betting. Through this collaboration, it has been possible to collect relevant information in order to trigger investigations into related match-fixing cases.

The mapping review also revealed examples of international collaboration (between organisations in different member states to effectively fight corruption in sport is present in other developments too. On such example of co-operation being used to help address corruption in sport, is the Declaration of intention with France (2018). This was signed by the UK government in order to share "best practice and expertise gained from hosting the London 2012 Olympic and Paralympic Games and England hosting the Rugby World Cup in 2015"³⁴, with the importance of partnership work recognised as a way of dealing with corruption threats within international sporting events.

Case study 3 – Sport Pulito Italia

Lead organisation	Italian Office for Sport
Key focus/objectives	Umbrella effort linking various partners (law enforcement, local authorities, local schools) and platforms (e.g. whistle-blower platform) together in order to promote integrity in sport and anti-corruption practices.
Member State(s)	Italy
Period	2017-ongoing
Programme funding	€450,000 for 2016/2017

³²<https://www.rf.se/globalassets/riksidrottsforbundet/dokument/dokumentbank/documents-in-english/swedish-sport---international-policy.pdf?w=900&h=900>

³³ Agenzie delle Dogane e dei Monopoli (ADM)

³⁴ Department for Digital, Culture, Media and Sport (2018) UK and France sign new agreements to tackle corruption and match fixing in sport.

Aims and approach

Building on an earlier fixed period initiative focused on match fixing only (Anti Match-Fixing - AMF), the Sport Pulito Italia programme aims to implement a more comprehensive and long-term oriented strategy focusing on broad types of corruption practices, such as doping, illegal gambling and commercial and governmental tricks (as well as match fixing).

In order to prevent corruption practices and promote integrity in sport, the strategy is based on different tools:

- **Multi-stakeholder platform:** following the approach adopted within the AMF project context, this platform aims at strengthening synergies between public and private stakeholders in order to increase their engagement and maximise the impact of anti-corruption practices. This platform includes approximately 200 actors from different organisations or institutions, such as the Italian Chamber of Commerce, Transparency International Italy, the Catholic University of Milan, ADM (Autonomous Administration of State Monopolies), law enforcement agencies, DNA (Anti-Mafia National Directorate), Olympic Committee, sport clubs, local schools, etc.
- **Whistle-blower digital platform:** the Rischio Reato Sport platform is a support service for anonymous reporting of illicit situations in sporting environments. The digital platform has mostly collected information on doping cases, but through its work, the multi-stakeholder platform aims to maximise the impact of the whistle-blower platform, by increasing its visibility and effectiveness through targeted promotion and communication activities. The reported cases are then analysed by Transparency International Italy and eventually transferred to the law enforcement agencies.
- **Pilot geographical area for testing the effectiveness of the overall strategy, and particularly of the multi-stakeholders platform.** The implementation of an experimental pilot area within the programme aims to provide legitimacy to the programme, in order to be recognised by the public bodies and other stakeholders as a useful platform and tool to deal with corruption practices in sport.

The initial funding allocated to this project was 450,000€ for 2016/2017 in order to conduct activities of research, analysis and, communication and also for the set-up of the whistle-blower platform. The project has to date only benefited from a basic budget mainly aimed at the maintenance of the platform and at funding operational activities within the pilot area.

Outcomes and learning points

During its first year of implementation, the main goal of the Sport Pulito Italia programme has been to gain visibility and legitimacy. In fact, the decision to establish a pilot area in Palermo, the capital of the Sicilian region is intended to show the benefits of promoting integrity in sport and counteracting corruption practices in those areas affected by socio-economic disadvantages and organised crime.

Although the programme is at an early stage of implementation it is possible to highlight the following areas of promising practice:

- **Multi-stakeholder platform:** the development of a cooperation framework in the area of sport and integrity represents promising practice due to the different types of stakeholders involved (from grassroots sport organisations to the Italian Olympic Committee, from the law enforcement agencies to the Italian Chamber of

Commerce, etc.). This is particularly relevant in order to provide the network with the capacity to deal with different types of corruption and criminal organisations.

- Role of the Chamber of Commerce: in the pilot area, the Chamber of Commerce in Palermo proved to be a reliable and efficient partner in promoting the integrity of sport and its social role. In this sense, an ad-hoc desk for sport has been established in the Chamber in order to collect information and to provide strategic advice relating to illegal behaviours in the sport field, in collaboration with the law enforcement agencies.
- Sport Pulito Italia has proved to be highly successful in achieving legitimacy and visibility in the Sicilian context. In fact, first attempts to extend the programme operations in other areas of the country have already started. The programme currently being implemented in other cities, such as Milan, Turin, Trento, Bologna, Lecce and Cagliari.

In the UK several organisations are working together to develop a collaborative approach to tackling corruption with a particular focus on addressing the risks associated with match-fixing and betting (case study 4). The main focus of this strategic approach to tackling corruption is through knowledge and information sharing (including examples of good practice and codes of conduct) and development of strong partnership working.

Case study 4 – Collaborative approach to sports betting integrity

Lead organisation	Department for Digital, Culture, Media and Sport (DMCS)
Key focus/objectives	Corruption as a whole
Member State(s)	UK
Period	2014 to present
Programme funding	Data not available

Aims and approach

As recommended in the 2014 UK Anti-Corruption Plan, the first Sports Betting Integrity Action Plan was published in 2015. The original (and subsequent action plans in 2016 and 2018) were developed by the Sports Betting Integrity Forum (SBIF), a multi-stakeholder body whose members include representatives from sports federations, betting operators, gambling regulators, sport and betting trade organisations and law enforcement agencies. The SBIF was established in 2012 to “develop Britain’s approach to protecting sport and sports being corrupted”³⁵. The forum investigates match-fixing and betting in events, with the aim of protecting Britain’s reputation at a national and international level as a safe country to enjoy sports and sports betting.

As well as linking to the 2014 UK Anti-Corruption Plan, the SBI Action Plan builds on work carried out as a result of the 2010 SBI Panel Report (Parry Report). The SBI Panel was put together in 2009 by the Minister for Sport to explore issues relating to sports betting integrity. The Panel comprised of police, players, fans, sports federations, the legal profession, the betting industry and the Gambling Commission, who together made recommendations about how the different stakeholders could work together to address sporting integrity issues. The SBIF, which has evolved from this initial panel, states that prevention of match-fixing and other betting corruption is important so as the “ethos,

³⁵ Sports Betting Integrity Forum (2018) *Mission Statement*. Available at: <https://www.sbif.uk/home.aspx>.

reputation and commercial viability of sports and betting businesses” is not undermined (SBIF, n.d.)³⁶.

The current SBI Action Plan advocates a collaborative approach to addressing corruption in sport, with the expected actions of agencies, betting operators, government, player associations and sports federations clearly defined. Current action plan objectives include hosting workshops to promote good practice and information sharing on subjects such as social media for intelligence gathering and assessing and dealing with threats to betting integrity. The SBIF’s ongoing work includes assessing the main threats to sports betting in order to identify key action areas, as well as working with networks such as the Copenhagen Group. This group is currently made up of 22 National Platforms which are working cooperatively to promote the Convention on the Manipulation of Sports Competitions (Macolin Convention) which aims to aid national co-ordination and international co-operation against the threat of the manipulation of sports competitions³⁷.

In addition, the Gambling Commission (itself a member organisation of the SBIF) also has its own specialist division, the Sports Betting Intelligence Unit (SBIU). This was set up as a result of a recommendation of the SBI Panel Report in 2010 and aims to combine the intelligence efforts of partners to protect sport from corrupt activities such as illegal gambling and betting. The SBIU shares information it receives with partners to aid investigations. It also produces quarterly reports with monitoring information and develops best policy position papers and guides.

Outcomes and learning points

The main outputs of the UK’s strategic approach to addressing corruption reflect an increasing emphasis on collaborative actions, including cooperation initiatives with partners at a national and international level. Information sharing in the form of intelligence information about potential threats to the integrity of sport and betting in the UK is also being collected is taking place and shared with partners. As well as this, best practice guidance has been provided and the need for transparent governance has also been stressed.

As a result of the 2014 Anti-Corruption Strategy, DCMS have set out the measures the UK is taking to combat corruption in sport within the ‘Integrity of Sport’ part of the Sporting Future: A New Strategy for an Active Nation. The first Sports Betting Integrity Action Plan, as required by the strategy, was published in 2015.

Since then two further ones have been published by the SBIF, with outputs of the Action Plans including:

- The development of a public facing website to share progress of work against match-fixing as well as sharing of communication.
- A review of the effectiveness of education programmes which deter betting corruption, including the development of a variety of learning materials tailored to different participants.
- Engagement with sport federations to share best practice and guidance on addressing betting integrity.
- The delivery of workshops on sharing evidence, misuse of information and standardising presentation of evidence to stakeholder groups.
- The assessment of major threats to sports and sports betting.

³⁶ Sports Betting Integrity Forum (n.d.) *Managing Betting Integrity: Help and support for British Licenced Operators*.

³⁷ Council of Europe (n.d.) *Convention of the Manipulation of Sports Competitions*, p.2.

- A review of best practice rules and regulations on betting to make sure that sports regularity frameworks are fit for purpose.

The current Action Plan highlights that collaboration is key, with the SBIF stating they will “continue to develop a culture of co-operation and co-ordinated actions” as part of their strategic approach³⁸. Similarly, the forum recognises that a joined up approach is necessary for long term success, stating “it requires government to align sports, sports betting and criminal justice policies focused upon tackling corruption in sports and sports betting and the protection of Britain’s reputation and influence”³⁹.

As well as co-operation and a multi-stakeholder approach being advocated by the SBIF in the fight against corruption, there has also been an emphasis placed on education. For example the resource sections available on their website include tools which can be used at a federation level. Good practice documents the SBIF have available include: integrity considerations for sports federations, code of practice guidance and Interpol’s approach to integrity in sport. There are also educational videos which have been developed to promote good practice and an understanding of the consequences of corruption. These include Football Association (FA) short films explaining betting rules and regulations, a British Horse Association video featuring Fergal Lynch video describing the impact that being involved in horseracing corruption had on his career and a video produced by the Professional Cricket Council which features Mervin Westfield taking about the ban he received for match fixing (which is being used to educate cricket players).

Since its formation, the SBIU has produced a number of different documents to promote sport betting integrity. These include the Misuse of Inside Information policy position paper, within which a misuse of information spectrum is presented as a tool to provide guidance for how to deal with integrity incidents⁴⁰. Key points, in the form of specific suggestions for actions to be carried out by sport federations, betting operators and other organisations involved in the betting industry are also included to discourage the misuse of information within these stakeholder groups.

The SBIU’s has also published Protecting Better Integrity guidance, which is designed to help and support organisers of international sporting events hosted in Britain⁴¹. Examples of events they have provided support for include the 2015 Rugby World Cup the 2017, the IAFF Athletics Championships and the 2017 Open. The information pack includes a checklist for hosting major international tournaments hosted in Britain – showing how their experience and information received is being used to develop best practice guides to defend the integrity of sport within the UK. In line with other documentation, their most recent newsletter reports members having attended an Interpol fact finding training session at the British Olympic Organisation⁴². As well as learning techniques for carrying out investigative work (in relation to competition manipulations and related corruption), the SBIU reports that the need for collaboration to promote sporting integrity was also stressed at this event.

Since the publication *Sporting Future: A New Strategy for an Active Nation*, collaborative work to address corruption in sport has continued to develop. For example the second annual report on the *Sporting Future* strategy notes that “through direct engagement with other governments, International Federations, the International Olympic Committee and international organisations, DCMS and UK Sport have continued to work

³⁸ Sports Betting Integrity Forum (2018) *Sport and Sports Betting Integrity Action Plan 2018*, p.4.

³⁹ Ibid.

⁴⁰ Gambling Commission (2018) *Misuse of inside information: Policy position paper*.

⁴¹ Sports Betting Intelligence Unit (2018) *Protecting Betting Integrity: Help and support for organisers of international sporting events hosted in Britain*.

⁴² Sports Betting Integrity Unit (2018) *Sports Betting Integrity: Quarterly Snapshot July 2018*.

closely to progress the new International Partnership Against Corruption in Sport (IPACS)⁴³. Formed in 2017, and building on the 2016 Anti-Corruption Summit, IPACS describes itself as an “informal network” bringing together a range of stakeholders to tackle corruption in governance⁴⁴. It is made up of three task forces which are seeking to address: “how to reduce the risk of corruption in public procurement, in the context of major sports events; how to ensure transparency and integrity in the awarding process of sport events selection and how to promote the convergence of the existing good governance frameworks, starting from the critical measures that are relevant to mitigate the risk of corruption”⁴⁵. This shows the continued emphasis on partnership work which is being used to tackle corruption.

Several sport federations also have sections on their websites designed at educating against corruption. For example the Rugby Players Association⁴⁶ has key information about betting integrity, outlining key rules and regulations as well as the consequences of breaking these. In addition, the FA⁴⁷ has a page incorporating educational videos as well as outlining key points in relation to match-fixing in football. The Professional Cricketers’ Association (PCA), goes a step further and has an Anti-Corruption tutorial video which is compulsory for all members to watch and means that they “cannot claim ignorance” in incidents of spot or match fixing⁴⁸. These educational tools along with the work sports federations and partnership organisations are carrying out at a higher level reflect the fact that all stakeholders involved have a role to play in helping to protect the integrity of sport within the UK and its reputation on a national and international platform.

6.3 Types of corruption addressed

In line with the empirical evidence on reported cases, most of the responses identified through the country mapping review, as indicated above, aim to address match-fixing and doping practices. Policies and initiatives aimed at preventing match-fixing could be observed in each of the countries reviewed. As indicated, these measures are mainly aimed at providing support to professional players by establishing anonymous reporting platforms (Austria, Finland, Germany and Italy), awareness raising or at strengthening penalties for manipulation of offences (Bulgaria, Cyprus, Germany, France, Malta, Spain and Sweden).

As also emerged in the previous sections, a large number of responses addressing corruption in sport focus on doping. Together with the measures aimed at establishing ad-hoc anti-doping agencies, several initiatives have been implemented in different countries including preventative measures aimed at raising awareness or providing law enforcement agencies with better instruments to actively prosecute individuals involved in doping practices. In response to a long lasting issue of doping of athletes, the Cyprus National Anti-Doping Organisation, for example, organises training courses in order to educate individuals on doping and the various illegal substances that fall under it. Educational courses include lectures and seminars delivered to athletes and various other stakeholders of sport.

Case study 5 – Tackling match-fixing in Finland

⁴³ HM Government (2018) *Second annual report on the Sporting Future Strategy*, p.13.

⁴⁴ Council of Europe (2018) *International Partnership Against Corruption in Sport (IPACS)*

⁴⁵ Ibid.

⁴⁶ The Rugby Players Association (2018) *Better Integrity*.

⁴⁷ The Football Association (2018) *Match Fixing*.

⁴⁸ Professional Cricketers’ Association (2017) *PCA Anti-Corruption*.

Lead organisation	Various
Key focus/objectives	Match-fixing
Member State(s)	Finland
Period	2011 -
Programme funding	n/a

Aims and approach

This case study brings together evidence from a range of resources to examine the effectiveness of existing policy instruments and new approaches in dealing with the problem of match-fixing in the Finnish football league. Despite generally limited evidence of corruption in sports in Finland⁴⁹, the Finnish football league stands out with several reported cases of bribery and match fixing. The corruption cases from recent years have shown that Finland may be particularly vulnerable to match fixing, especially in relation to men's football.⁵⁰

Since 2011, Finland has strengthened the legal framework to tackle corruption in the sport as a response to the match-fixing scandals. The key figure at the centre of the first high profile cases was Wilson Raj Perumal, a Singaporean who was responsible for bribery of the Finnish football players involving more than €450,000 and several matches during the period 2008-2011. Perumal was sentenced for two years of imprisonment for fixing hundreds of matches on a global scale while the Finnish football club associated with Perumal had to leave the football league and 11 senior players were arrested.⁵¹ This international profile of this case shook the Finnish Football Association. Prior to this case, Finnish penalties for corruption were set at relatively low levels with a maximum penalty of two years imprisonment. In the aftermath of this case, in 2011 the Criminal Code was changed and penalties were increased by up to four years of imprisonment for giving or receiving bribes in sport-related activities.⁵²

The recent cases in Finnish men's football involved bribery of players/coaches to influence the match results.⁵³ Five cases of match fixing in Finnish football were uncovered during the years 2009-2013. The court identified all these cases as a passive or active act of bribery in business and all cases resulted in conditional imprisoning (up to one year) for all actors involved, except one case of active bribery when the person was imprisoned for two years.⁵⁴

A number of reasons have been suggested for explaining the higher number of corruption cases in football compared to other sports in Finland. There are a number of specific conditions that may make it easier for criminals to be successful in influencing the matches in Finnish football.⁵⁵ These specific features can be identified:

- The first specific condition is related to the timing of the football season which is between April and October. It has been argued that the summer schedule increases

⁴⁹ Lotteriinspektionen (2013). *Match-fixing in the Nordic countries*

⁵⁰ Annukka Timonen (2016). *New media approaches to tackling match-fixing in Finnish football*. In Global Sport Corruption Report. Transparency International 2016.

⁵¹ <https://www.theguardian.com/football/2011/jun/09/match-fixing-trial-finland-football>

⁵² Antti Koivula (2013). *Realities of football match-fixing – case Finland*. Published at LawInSport.

⁵³ Lotteriinspektionen (2013). *Match-fixing in the Nordic countries*

⁵⁴ Peurala, J. (2013). Match-manipulation in football-the challenges faced in Finland. *The International Sports Law Journal*, 13(3-4), 268-286.

⁵⁵ LawInSport online article "Realities of football match-fixing – case Finland", published on 2nd of October 2013 by Antti Koivula https://www.lawinsport.com/topics/sports/football/item/realities-of-football-match-fixing-case-finland?category_id=153

the spotlight on the Finnish league and opens up more opportunities for more bribery to be centered on one country.⁵⁶

- The second characteristic of Finnish football is that the players receive a relatively low salary in comparison to other professions in Finland. In 2010, the average full-time salary of full-time employee was twice the average salary of a footballer inplaying in the Veikkausliiga (the Finnish Premier League) This means that Finnish players may have been more open to bribery than players in other leagues in Europe where pay levels were much higher.
- The third feature of Finnish football driving match fixing is that football is less popular among the Finnish population. This leads to lower media coverage and low stadium attendance. The average stadium attendance of the largest football league Veikkausliiga was on average three times lower per match in comparison to other Nordic countries with similar populations.⁵⁷ In an environment of lower media coverage and lower interest in football, it is therefore easier for players to perform at a lower standard in order to influence the results of a match.

The fight against match fixing in Finland is a collaborative effort of various organisations. In 2012, the Gambling Administration Department of the National Police Board was established as an independent supervisory authority responsible for the lotteries including sports betting at the national level.⁵⁸ Another body involved in fighting sports corruption in Finland is the Finish Sports Federation (FSF), the largest sports organisation in Finland. The FSF is responsible for the recommendations related to disqualification, prevention of corruption and communication among other stakeholders. FSF was actively involved in work related to the match fixing scandal in 2011 and took part in the match-fixing workshop organised by Interpol in 2012.

The organisation dealing specifically with corruption in football in the Finnish context is Suomen Palloliitto (SP). The SP is an umbrella organisation responsible for the effective distribution of information and publishing the materials with instructions on what actions to take if bribery and match fixing happen in football.⁵⁹

On the national level, there is no specific legislation addressing the corruption in sports. However, the Criminal Code of Finland includes certain sections which can be applied to match fixing. More specifically, Chapter 30 of the Criminal Code describes the Business offenses, Chapter 32 Receiving and money laundering offenses (61/2003) and Chapter 36 is related to Fraud and other dishonesty (769/1990).

In 2013, the association of the professional football players Jalkapallon Pelaajayhdytys (JPY) has launched a new initiative called the 'Players Red Button'. This initiative uses the current technology to detect the match fixing among the football players. In the partnerships with Union of European Football Association, Birkbeck University of London and the Finnish Ministry of Culture and Education, the working group designed the phone app 'Don't Fix It' which is part of the bigger campaign against the match fixing. The idea behind this initiative is that through the phone app, football players will quickly and discretely report any suspects of the bribery and manipulation related to match-fixing. With the individual codes, each football player can anonymously report that has been contacted by the match-fixer or knows about some potential match-fixing case in the

⁵⁶ Ibid

⁵⁷ Association of European Professional Football Leagues (2018) "European Leagues Fan Attendance Report"

https://europeanleagues.com/wp-content/uploads/FINAL-EPFL_FA_18-VERSION-2018.01.12.pdf

⁵⁸ <https://www.arpajashallinto.fi/gambling/supervision/gamblingadministration>

⁵⁹ Lotteriinspektionen (2013) *Match-fixing in the Nordic countries*.

football club. All messages are processed by the security company and shared with the police if needed.

An education programme also started in 2013 which is implemented through the Player's Union. The topics covered in the face-to-face sessions are around six main themes⁶⁰:

- Educating players on the betting rules, and ensuring that they know how to avoid breaking the rules.
- Managing the finances, making players aware of the gambling addiction and how to avoid debt.
- Planning of the end of career for older players who may be facing a financial cliff face as they move down the leagues or out of the game.
- Encouraging younger players to think about their career and how to make the most of their time.
- Educating players on the types of match fixing, how it works, how to avoid getting into trouble and what are the consequences of getting involved in corruption.
- Making players aware of the reporting systems so they know where to seek help and advice.

Outcomes and learning points

Experts from sports federations and associations have valued the initiative Players Red Button. The common agreement and a priority among the experts is to continue the education and information measures which they perceive as the main action against the match fixing in the Finish context.⁶¹

The phone app initiative is well accepted by the professional football players. After the football union presented the initiative to the individual clubs, the phone app has been downloaded more than 1,200 times. It was reported that the older players recognise the significance of this problem and welcome the app; on the other hand, younger players tend to be more reluctant toward using it as they have not been exposed to match fixing largely and do not see the need for it.⁶² Since 2013, the app has already proved its value as the professional football players have been actively using the app and reporting suspicious activity with regards to match-fixing or manipulation. It was pointed out by the JPY Executive manager that criminals usually try to corrupt those players who can be easily influenced. He argues that the way to decrease the risk of influencing the players is to create a safe environment and good conditions for players, including a punctual salary payment and competitive salary which reduces the temptation for an extra benefits.⁶³

During the expert meeting in 2014, the Finnish sports federations and associations recognised that there is a need for a specific term for a criminal offence related to sports. At the moment, the prosecutors usually name the case as a 'fraud' or 'bribery in business' offense. However, some experts at this meeting suggested that there should be a specific offence dedicated to the frauds in sports. Additionally, the experts agreed on establishment of a new special unit, namely General Ethical Commission for Sports which would be set up by the Ministry of Education and Culture and hold a responsibility for manipulation and crime in sports.

⁶⁰ T. Higgins (2013) *Protect our Game: A Good Practice Guide for Professional Football Players' Associations to tackle match-fixing in football*

⁶¹ Ibid

⁶² Annukka Timonen (2016). New media approaches to tackling match-fixing in Finnish football. In Global Sport Corruption Report. Transparency International 2016.

⁶³ FifPro (2014) Finnish match-fixing app shows its value <https://fifpro.org/news/finnish-match-fixing-app-shows-its-value/en/>

Even though there are various bodies in Finland responsible for different fields in a sport, and the general perception is that a single body would not be able to face all the challenges of corruption alone⁶⁴, the idea of establishing a separate body responsible for tackling corruption in sport is also supported by academics. Peurala (2013)⁶⁵ suggest that the independent organ would help to detect the cases and combat the corruption, conduct surveys, and gather the evidence and advice on corruption-related issues.

In addition to initiatives addressing match-fixing and doping, the mapping has also identified responses that provide a more holistic approach to address corruption practices in sport including types of corruption where empirical evidence on their prevalence is less strong.

- In Italy a specific law on sport fraud⁶⁶ was introduced in order to separate sport crimes from existing criminal law. While this legal measure was mainly aimed at criminalising match-fixing practices, it also introduced specific penalties relating to tax evasion.
- The Bulgarian State Agency for National Security has implemented in 2018 a legal measure which obliges sport clubs to provide relevant documentation to the authorities that will then assess the associated risk of money laundering.
- The Code for Sports Governance led by Sport England and UK Sport was published in 2016. Within this document the levels of transparency, accountability and financial integrity required from those who ask for Government and National Lottery funding from April 2017 were set out⁶⁷. The Code stressed integrity and transparency throughout all aspects of governance, aiming to address types of corruption such as bribery, money laundering, tax evasion, match fixing, illegal gambling and betting. The Code requires organisations to have a formal bank account which funds can be paid into and two independent signatories to “mitigate the risk of fraud and/or maladministration”⁶⁸. A further requirement is that annual accounts are prepared (then reviewed by an independent person) and made available to members, with the view that this will ensure accountability and promote integrity. At a national level, the Code for Sports Governance has meant progress has been made with sporting bodies and the way they are being governed. By December 2017, 55 out of 58 of the UK’s sport federations had met all of the Code for Sports Governance requirements, which amongst other requirements needed the bodies to show greater transparency in their governance⁶⁹. The initiative has continued to be rolled out to the remaining three national federations as well as 600 other sporting bodies throughout the country.

Case study 6 – Response to nepotism, bribery and Governance selection 'tricks' allegations - Rules & Guidelines

Lead organisation	Cyprus Sport Organisation
Key focus/objectives	The Code is aimed at addressing the deep rooted causes of corruption, such as nepotism, lack of transparency, conflicts of interest, long term uncontrolled governance.
Member State(s)	Cyprus

⁶⁴ Lotteriinspektionen (2013) Match-fixing in the Nordic countries

⁶⁵ Peurala, J. (2013). *Match-manipulation in football-the challenges faced in Finland*, The International Sports Law Journal, 13(3-4), 268-286.

⁶⁶ Law 401/1989

⁶⁷ Sport England and UK Sport (2016) Code for Sports Governance.

⁶⁸ Ibid, p.24.

⁶⁹ Sport England (2017) High Compliance with New Code. Available at: <https://www.sportengland.org/news-and-features/news/2017/december/20/high-compliance-with-new-governance-code/>.

Period	The code comes into effect from 1/1/2019
Programme funding	Cyprus Sport Organisation with public funding

Aims and approach

In order to regulate and promote sports in Cyprus, the Government of the Republic of Cyprus has established, by Law No. 41 of 1969, a public body under the name of "Cyprus Sport Organisation" (CSO). This organisation is an independent, non-profit institution governed by a Board of nine Members appointed by the Council of Ministers. Its mission is to promote sports and athleticism, and cultivate the Olympic spirit and sportsmanship amongst the people of Cyprus. It is the highest sport authority in Cyprus, and receives public funding.

The CSO is actively engaged in the endeavour to promote better sport governance, both at the national and international level. Corruption and mismanagement scandals in sports organisations in Cyprus have urged public actors like CSO to increase their efforts to regulate the behaviour of Sports Federations. The lack of good governance standards had led to an environment where bribery, nepotism, conflicts of interest, governance selection and commercial partnership 'tricks' have been allowed to thrive.

At the international level, CSO is one of the founding members of the SIGA (Sport Integrity Global Alliance), a newly established independent international organisation made up of governmental and non-governmental bodies. The SIGA will soon be able to certify the good governance of Sports Organisations, Federations and Associations. The CSO is also one of the associated partners of the EU-funded National Sports Governance Observer (NSGO) project, whose aim is to develop and implement indicators that enable national sports organisations to raise the quality of their governance practices.⁷⁰

At the national level, CSO capitalised on its international experiences to develop the first Code of Good Governance for the Cypriot Sport Federations. In collaboration with UCLAN University Cyprus, the CSO built upon the NSGO research, guidelines of the European Parliament, the European Commission and the Council of Europe, and good practices of countries such as Belgium, the United Kingdom, Poland, Australia and New Zealand.

The Code intends to address conflict of interest issues that are highly relevant to a small island like Cyprus. Financial and management audits of sports federations in Cyprus had often revealed close relationships between Board members and athletes, who were subsidised by the federation. There was also growing evidence of favouritism to particular individuals and organisations in the award of contracts.

The Code comes into effect from the 1st of January 2019. The funding for the Code design and implementation comes from the government, which supports the operations of the CSO.

Implementation mechanisms

The Code focuses on four pillars of good governance: transparency, democratic processes, internal accountability and control, and social responsibility. Transparency refers to an organisation's openly reporting on its internal processes, for others to be able to monitor these operations. Democratic processes refers to the organisation holding free, fair and competitive elections; involving relevant stakeholders in decision-making processes; and promoting fair and open internal debates. Internal accountability and control entail the separation of powers within the organisation's governance

⁷⁰ <http://www.playthegame.org/knowledge-bank/downloads/national-sports-governance-observer-indicators-for-good-governance-in-national-federations-/48355886-16a9-45ff-9b6e-a8d900ab8f5b>

structure, and the presence and implementation of a system of rules and procedures that guarantee that staff and officials comply with internal regulations. Societal responsibility refers to the organisation deliberately making efforts to have a positive impact on internal and external stakeholders and society as a whole.⁷¹

To ensure that the four pillars are in place, the Code requires Federations to develop a strategic plan that describes their operations in the next five years, in accordance with the Olympic cycle. To reduce the bureaucratic demands related to Code implementation, the CSO is supported by a series of supplementary actions. It is developing a manual on how to design a strategic plan, which includes templates for small, medium and large Federations. Through a call for tender, it is recruiting professionals who will support the Federation in the execution of this task. The CSO is also preparing a manual on how to develop a risk assessment plan, as well as how to conduct internal accounting procedures. With funding availability, it will be able to organise workshops focused on practical implementation issues, and provide each Federation with one-to-one support.

The Code does not envisage penalties in case of non-compliance. However, the CSO is redrafting its criteria for funding Federations. From now on, part of the funding will be based on good governance and performance. In the first year of implementation, as Federations need time to adapt to the new requirements, this will be framed as a bonus, with the government providing additional funding to the Federations that comply with the code. In the next years, an increasing percentage of funding might be dependent on code compliance.

To identify and address implementation gaps, a stringent monitoring system is already in place. For Federations to get CSO funding, they have to present a budget based on activities the CSO prescribes. Once the budget is approved, the funds are released at three different stages and dependent on the reporting of financial and non-financial activities. In addition, the CSO outsources administration controls to audit firms that conduct regular checks on Federations. The CSO internal committee then assesses the audit reports and tries to resolve outstanding issues. With the introduction of the Code, the CSO is adding another layer to this monitoring process. Every year they will require that Federations include a governance compliance self-check in their report, and audit firms will include this element in their reports.

In 2020, the CSO will conduct the first assessment of the Code effectiveness. Based on any issues or challenges the Federations have experienced, the CSO will provide them with instruction materials. In 2021, the Federations will be in a better position to implement the Code, which will allow the CSO to conduct a second and more substantial assessment in 2022. The CSO does not expect full compliance with the Code, but they will use these assessments to gradually orientate the Federations in this direction.

One of the main challenges of the project is that no common definition and measurement of 'governance' and its components exists. This is problematic because Sport Federations need to understand what principles constitute good governance, and how and why these principles can benefit the sport system and improve their operations, in order to be able and motivated to put these principles in practice. This requires good dissemination and learning activities, which the CSO is planning to provide as part of a project funded by Erasmus+. They are developing an Internet platform that will include educational materials and lectures in five different languages. This will clarify the CSO definition of good governance, which is based on the four pillars of the NSGO project, and provide practical information on how to implement it.

⁷¹ <http://www.playthegame.org/knowledge-bank/downloads/national-sports-governance-observer-indicators-for-good-governance-in-national-federations-/48355886-16a9-45ff-9b6e-a8d900ab8f5b>

Equally challenging is for the Federations to accept the need to put a limit to Board members' term. The CSO is still discussing this controversial point with the Federations, pondering a transitional phase.

Furthermore, CSO is aware that Federations members are all volunteers, and it does not want to overburden them with requirements. This has led the Organisation to put aside important issues such as gender equality and minor protection. Going forward, as Federations are more confident with the Code implementation, the CSO plans to incorporate these issues into the Code.

7.0 Key conclusions and recommendations

7.1 Key conclusions

The need to tackle corruption in sport is an important element of EU's policy on sport integrity. The rapid literature review undertaken for this study has shown that the more detailed empirical studies of corruption in the EU tend to focus on the prevalence of match-fixing and doping cases. This is reflected in the mapping research for this study as despite adopting a broad definition of corruption in setting the parameters of the research, the vast majority of cases identified from recent years in the sample countries were identified as either doping or match fixing cases.

The mapping research has emphasised the complex interplay of factors and contextual issues that can influence match-fixing activity. The research has also provided insights in to the diversity of match-fixing practices and its association with other types of corruption such as bribery and betting. Specific examples of match-fixing have also revealed the importance of factors such as pay levels of athletes and the level of media exposure of specific matches.

Aside from match-fixing and doping, the mapping review has revealed very few examples of other types of corruption in sport across the EU. This does not necessarily mean that other types of corruption do not exist as such cases may be more difficult to detect through mapping exercise which is reliant on using rapid research approaches across a range of countries. The broader academic literature review indicates however that due to the lack of a transparent system of reporting in sport, the sport industry has become a fertile ground for other corruption activities such as money laundering and tax evasion.

The mapping of responses at the Member State has revealed a variety of measures that have been implemented in recent years. These include: new legislation; new policy initiatives; tighter regulations; more stringent fines; organisational restructuring; educational programmes; multi-stakeholder platforms for information sharing; and whistleblowing initiatives.

Based on a limited number of case studies, the research has highlighted a number of key conclusions with regard to the effectiveness of responses and particular features of promising practices in this area:

- **There is evidence that the introduction of stricter legal penalties reduces levels of match-fixing:** Legal penalties have been shown to work in countries where there was previously a high prevalence of match fixing.
- **There is a need to focus on preventative measures as well as legal penalties:** the case studies have highlighted a range of education and awareness raising initiatives that have been shown to be successful in terms of take-up amongst sport professionals and, based on anecdotal evidence, their ability to improve understanding, influence behaviour and encourage reporting of suspicious behaviour.
- **The role of multi-stakeholder groups for preventing and tackling corruption in sport:** some case studies have highlighted the potential for involving all relevant actors in addressing specific corruption practices including judicial bodies, government ministries, national sport agencies and federations.
- **There is an increasing emphasis on promoting 'good governance' practices in sport federations:** such codes are being introduced in order to address other types

of management corruption such as bribery, money laundering and tax evasion, as well as more well-known forms of corruption such as match-fixing.

7.2 Recommendations

This small-scale research has addressed the topic of sport and corruption from a broad and open-ended perspective and therefore it has not been possible to address the prevalence of specific types of corruption in a systematic and detailed way. The research findings nevertheless provide evidence and insights in understanding how the EU could potentially add value to existing initiatives in this area. This section sets out a number of recommended actions that could be taken to develop more systematic evidence on the topic and to further promote effective practice in this area.

- **Supporting mechanisms for cooperation in addressing corruption:** The study has highlighted various initiatives taken forward by international sport federations. There is potentially a role for the EU to add value to these initiatives by facilitating the development of new networks focused on addressing specific types of corruption. The EU's potential role would be to facilitate cooperation between the various relevant actors who have a role in addressing corruption practices. This role could involve developing multi-stakeholder groups concerned with addressing specific types of corruption based on a detailed assessment of the role of specific actors as well as current networking arrangements. Enhanced cooperation would also allow sharing of information on good practice and help to support their implementation internationally.
- **Enhancing knowledge on sport and corruption across the EU:** There are a number of potential mechanisms that the EU could use to encourage the development of better knowledge on sport and corruption across the EU. Through the development of networks with relevant federations and more formal recommendations, the EU could help to promote more systematic monitoring of corruption cases across the EU. Building on the limited number of case studies completed for this study, it is also recommended that more systematic evidence is collected on the current state of play in the EU with regard to understanding what works well in addressing corruption in sport. This would draw on more systematic evaluation evidence including primary research with stakeholders in Member States. Generally there is a need to improve evaluation evidence on the impacts and effectiveness of government responses that aim to deal with corruption.
- **Support the development of good practice sharing and dissemination:** The EU potentially has a role to play in enhancing knowledge sharing on approaches to addressing corruption, for example through networking events for international sport federations. It is also recommended that actions are developed to support dissemination of and knowledge sharing on good practice responses. This could include European level conferences held on an annual or biannual basis that allow projects to present their approaches and good practice features. Responses to addressing corruption could also be included as a regular topic in events such as the EU Sport Forum. Building on the recommendations above, the EU could also support actions to develop capacity building of relevant authorities and sport federations in member states. The research has identified examples of practices where the promotion of common understandings and good practice may be helpful in addressing corruption (recommendations below).
- **Support the development of common understanding of appropriate and proportionate penalties for corruption activities:** This research has highlighted the potential to develop a common understanding on the use and effectiveness of appropriate penalties to address corruption practices.

- **Support the development of common definitions and measurement frameworks for 'good governance' and its component parts:** This research has highlighted a number of areas of promising practice in the development and implementation of 'good governance' approaches to addressing corruption. Building on the recommendations above, there is potential for the EU to play a role in supporting actions to develop common understanding on the elements required to promote good governance practice amongst sport federations. It is important for sport federations to understand the principles that constitute good governance, and how and why these principles can benefit the sport system and improve their operations, in order to be able and motivated to put these principles in practice. The promotion of codes of best practices in 'good governance', illustrated by the case study examples of Cyprus and the UK could be beneficial for the sport industry.
- **The role of Member States in addressing corruption:** The case studies have highlighted the particular role that Member States can play in leading strategically on the fight against corruption and in promoting transparency and information sharing at the national level. It is recommended that Member State governments address corruption in national sport strategies and national action plans based on consultation with all the relevant stakeholders. Governments should also play a role in supporting multi-stakeholder platforms to address specific types of corruption. There is also potentially a role for Member States in collecting data and evaluation evidence on the effectiveness of policy responses, in line with the recommendation above.

Annex One: Sources

- Amundsen, I. (1999). *Political Corruption: An Introduction to the Issues*. Michelsen Institute Development Studies and Human Rights. Working Paper No. 7, 1-33.
- Aquilina, D., & Chetcuti, A. (2014). *Match fixing: The case of Malta*, International Journal of Sport Policy and Politics, 6, 2-22.
- Bauhr, M. (2017). *Need or greed? Conditions for collective action against corruption*. Governance, 30(4), 561-581.
- Bozkurt, E. (2012). *Match Fixing and Fraud in Sport: Putting the Pieces Together*, European Parliament, 17 September.
- Brooks, G., Aleem, A., & Button, M. (2013). *Fraud, Corruption and Sport*, Basingstoke: Palgrave Macmillan.
- Buraimo, B., Migali, G., & Simmons, R. (2016). *An analysis of consumer response to corruption: Italy's Calciopoli scandal*, Oxford Bulletin of Economics and Statistics, 78(1), 22-41.
- Brasseur, A. (2012). *The need to combat match-fixing*, Draft resolution adopted by the Committee on Culture, Science, Education and Media, Parliamentary Assembly, Council of Europe.
- Breivik, G, Hanstad D.V. and Loland S (2009) *Attitudes towards use of performance-enhancing substances and body modification techniques: A comparison between elite athletes and the general population*, Sport in Society, 12:6, 737-754, DOI: 10.1080/17430430902944183
- Capasso, S., & Santoro, L. (2017). *Active and passive corruption: Theory and evidence*, European Journal of Political Economy, 52(C), 103-119.
- Carpenter, K. (2014) *Match-Fixing – Framing the Fight Back*, International Centre For Sport Security Journal. Vol. 2, No. 4, pages 62 – 79.
- Castillo EM, Comstock RD (2007) *Prevalence of use of performance-enhancing substances among United States adolescents*, Pediatric Clinics of North America. 54: 663-675.
- Claramunt, J. C. (2018) *Corrupción y buen gobierno en el deporte: Breve análisis del caso Soule*, Dilemata, (27), 115-130.
- Council of Europe (2017) International Partnership Against Corruption in Sport. Retrieved August 21, 2018. <https://www.coe.int/en/web/sport/ipacs>
- Council of Europe (2014) *Convention on the Manipulation of Sports Competitions*, Treaty Series - No. 215.
- De Hon, H. Kuipers, M. van Bottenburg (2014) *Prevalence of doping use in elite sports: A review of numbers and methods*, Sport Medicine, 45, pp. 57-69.
- Deutscher, C, Dimant, E and Humphreys, B.R., (2017) *Match Fixing and Sports Betting in Football: Empirical Evidence from the German Bundesliga*.

Dunn M, Thomas JO and Swift W (2012) *Elite athletes' estimates of the prevalence of illicit drug use: evidence for the false consensus effect*, *Drug Alcohol Rev*;31(1):27–32.

EU expert group on match fixing (2014) *State of Play on the fight against match fixing*.

Feltes, T. (2013) "Match-fixing in Western Europe", in Haberfeld, M.R. and Sheehan, D. (Eds), *Match-Fixing in International Sports: Existing Processes, Law Enforcement, and Prevention Strategies*, Springer International Publishing, London, pp. 15-30.

FIFA (2018). Code of Conduct. Retrieved August 24, 2018.

FIFPRO (2012). Black Book Eastern Europe. *The problems professional footballers encounter: research*.

Forrest, D. (2012). *The threat to football from betting-related corruption*, *International Journal of Sport Finance*, 7, 99–116.

Gardiner, S., Parry, J., & Robinson, S. (2017). *Integrity and the corruption debate in sport: where is the integrity?*, *European sport management quarterly*, 17(1), 6-23.

Gilpatric, Scott M. (2011). *Cheating in Contests*, *Economic Inquiry*, 49(4): 1042-1053.

Gorse, S. (2013). *Corruption in international sport: Implications for sponsorship management*, (Doctoral dissertation, Coventry University).

Gorse, S., & Chadwick, S. (2011). *The prevalence of corruption in international sport. A Statistical Analysis*, Coventry: Centre for the International Business of Sport, Coventry University Business School.

Heidenheimer, A. J. (2002). "Perspectives on the Perception of Corruption." In A. Heidenheimer and M. Johnston (Eds). *Political Corruption—Concepts and Contexts*. New Brunswick & London: Transaction Publishers.

Hill, D. (2009). *How gambling corruptors fix football matches*, *European Sport Management Quarterly*, 9, 411–432. doi: 10.1080/16184740903332018

Hill, D. (2010). *A critical mass of corruption: Why some football leagues have more match-fixing than others*, *International Journal of Sports Marketing & Sponsorship*, 11, 221–245. doi: 10.1108/IJSMS-11-03-2010-B005

International Association of Athletics Federations (2018). Rules & Regulations. Retrieved August 23, 2018. Available at: <https://www.iaaf.org/about-iaaf/documents/rules-regulations>

International Boxing Association (2018). Official AIBA documents.

International Centre for Sport Security (2018). About the ICSS.

International Cycling Union (2016) *UCI Code of ethics*.

Interpol (2017). *Crimes in Sport*. Retrieved August 21 (2018).

Institut de relations Internationales et Stratégiques (IRIS) (2012). *Sports betting and corruption: How to preserve the integrity of sport*

Joint Nordic working group to chart match-fixing in the Nordic region (2013).

KEA, (2012). *Match-fixing in sport A mapping of criminal law provisions in EU 27*, Retrieved September 1, 2018.

Kihl, L.A., Skinner, J., & Engelberg, T. (2017) *Corruption in sport: understanding the complexity of corruption*, *European Sport Management Quarterly*, 17:1, 1-5

Kihl, L. A., & Richardson, T. (2009). "Fixing the mess": A grounded theory of a men's basketball coaching staff's suffering as a result of academic corruption. *Journal of Sport Management*, 23, 278–304.

Kim J., Kang S.K. and Jung H.S. (2011). *Dietary supplementation patterns of Korean Olympic athletes participating in the Beijing 2008 Summer Olympic Games*. *Int J Sport Nutr Exerc Metab*. 21(2):166–74

Lamberti, A. (2014). *When the beautiful game turns ugly: A study of fan experiences of perceived match fixing in soccer*, (Master of Arts in Applied Health Sciences (Sport Management)). Brock University: St Catherines.

Lazuras L, Barkoukis V and Rodafinos A (2010). *Predictors of doping intentions in elite-level athletes: a social cognition approach*, *J Sport Exerc Psychol*. 32(5):694–710.

Laure P, Binsinger C, Scanff CL (2004). *Difficultés méthodologiques lors d'enquêtes nationales sur le dopage des adolescents. A propos d'un cas*. *Science & Sports*. 2004: 19: 86-90.

Maennig, W. (2005). *Corruption in international sports and sport management: Forms, tendencies, extent and countermeasures*. *European Sport Management Quarterly*, 5(2), 187-225.

Manoli, A. E., & Antonopoulos, G. A. (2015). 'The only game in town?': football match-fixing in Greece, *Trends in Organized Crime*, 18(3), 196-211.

Manoli, A. E., Antonopoulos, G. A., & Bairner, A. (2017). *The inevitability of corruption in Greek football*, *Soccer & Society*, 1-17.

Manoli, A. E., Antonopoulos, G. A., & Levi, M. (2016). *Football clubs and financial crimes in Greece*, *Journal of Financial Crime*, 23(3), 559-573.

Masters, A. (2015). *Corruption in Sport: From the playing field to the field of policy*. *Policy and Society*, 34(2), 111-123.

Morente-Sánchez J, Mateo-March M, Zabala M (2013) *Attitudes towards Doping and Related Experience in Spanish National Cycling Teams According to Different Olympic Disciplines*, *PLoS ONE* 8(8): e70999.

Peretti-Watel, P., Guagliardo, V., Verger, P., Mignon, P., Pruvost, J., & Obadia, Y. (2004). *Attitudes Toward Doping and Recreational Drug Use Among French Elite Student-Athletes*, *Sociology of Sport Journal*, 21(1), 1-17.

Philp, M. (1997). *Defining political corruption*, *Political Studies*, 45(3), 436-462.

Rose-Ackerman, S. (1999). *Political corruption and democracy*, *Faculty Scholarship Series*, 14(2), 363-378.

Ryvkin, Dmitry. 2013. *Contests with doping*, Journal of Sports Economics, 14(3): 253-275.

Serby, T. (2015). *The Council of Europe Convention on manipulation of sports competitions: The best bet for the global fight against match-fixing?* The International Sports Law Journal, 15 (1-2). pp. 83-100.

Simons, T. L. (1999). *Behavioral integrity as a critical ingredient for transformational leadership*, Journal of Organizational Change Management, 12(2), 89–104.

Sorbonne and ICSS (2014) *Protecting the Integrity of Sport Competition*, Sorbonne-ICSS Research Programme on Ethics and Sports

Spapens, T., & Olfers, M. (2015). *Match-fixing: The current discussion in Europe and the case of the Netherlands*, European Journal of Crime, Criminal Law and Criminal Justice, 23, 333–358.

The Tennis Integrity Unit (2018). About the TIU.

Transparency International (2016a). *Global Corruption Report Sport*, Oxon, UK: Routledge.

Transparency International (2016b). *Corruption in Sport Initiative*.

Ulrich, R. et al (2017). *Doping in Two Elite Athletics Competitions Assessed by Randomized-Response Surveys*, Sports Medicine DOI: 10.1007/s40279-017-0765-4

Van Rompuy, B. (2015). *The Odds of Match Fixing. Facts and Figures on the Integrity Risk of Certain Sports Bets*, T.M.C. Asser Instituut: International Sports Centre.

Werner P, Eike E, & Markus K. (2007). *Doping in elite sports in Germany: results of a www survey*, European Journal for Sport and Society, 4:2, 89-102.

World Anti-Doping Agency (2015). World Anti-Doping Code 2015.

Yilmaz, S., Manoli, A. E., & Antonopoulos, G. A. (2018). *An anatomy of Turkish football match-fixing*, Trends in Organized Crime, 1-19.

HOW TO OBTAIN EU PUBLICATIONS

Free publications:

- one copy:
via EU Bookshop (<http://bookshop.europa.eu>);
- more than one copy or posters/maps:
from the European Union's representations (http://ec.europa.eu/represent_en.htm);
from the delegations in non-EU countries (http://eeas.europa.eu/delegations/index_en.htm);
by contacting the Europe Direct service (http://europa.eu/europedirect/index_en.htm) or
calling 00 800 6 7 8 9 10 11 (freephone number from anywhere in the EU) (*).

(*) The information given is free, as are most calls (though some operators, phone boxes or hotels may charge you).

Priced publications:

- via EU Bookshop (<http://bookshop.europa.eu>).



