

**Effectiveness of European Countries' Laws and Regulations  
Dealing with Match-Fixing  
(FINAL REPORT)**

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## Executive summary

The report introduces outcomes of a research project conducted by the Slovak Football Association with support of UEFA, called „Effectiveness of European Countries' Laws and Regulations Dealing with Match-fixing“, aiming to uncover the latest trends and best practices in the fight against match-fixing in legal systems of UEFA member associations. Already in the interim report stage, it was clear enough that UEFA associations' countries are working towards introducing specific crimes on sports corruption and sports manipulation disregarding the fact whether they have signed or ratified the Macolin Convention or not. Clear was also the importance of actual investigative practice rather than importance of legal regulation.

Therefore, in the second phase of the research, researchers paid attention primarily to the actual forms of investigation of match-fixing, as well as to the actual forms of cooperation between various stakeholders, and ways to strengthen and streamline the efficient cooperation in order to reach visible outcomes in the fight against match-fixing. The second stage of the research project was thus aimed at the following:

- to evaluate the currently available tools that the national associations dispose of with respect to match-fixing identification, investigation and sanctioning, and based on the outcomes to recommend a uniform internal disciplinary model for investigating and sanctioning match-fixing by the national associations themselves,
- to propose a model for whistleblowers' protection, applicable within the internal norms of football associations of each UEFA country (e.g. including designing a website and introducing a special hot-line),
- to recommend to UEFA to initiate and promote among the national associations the idea of cooperation within national platforms and to support the idea of establishment of national platforms e.g. by exerting pressure by associations on relevant state authorities.

Our conclusions consist in

- a. recommendations with respect to **establishment of efficient national platforms** as well as promotion of international cooperation between the platforms in order to streamline the fight against match-fixing at least at the level of voluntary cooperation without having the state legislation involved, as well as
- b. recommendations of the most viable ways of **internal regulation of the fight against match-fixing (including whistleblowers' protection)** that UEFA may recommend and promote among the member countries (associations).

Our key recommendation coming out of this research project is, that UEFA should do its best to **recommend its member associations to exert pressure on their national governments to establish a national platform**, involving among other

representatives from football. **Best practices with respect to composition and competences of the platform are summarized in the report.**

UEFA should also do its best to **introduce uniform rules against match-fixing at the level of disciplinary rules** around the UEFA member associations. Thereby, **strict sanctioning principles as well as relatively broad competences for investigative bodies** should be guaranteed.

UEFA could furthermore:

- improve a **system for anonymous reporting** of match-fixing
- propose a uniform internal regulation of **personal data processing** with respect to match-fixing investigations
- insist on detailed regulation of **anti-match-fixing in the players' contracts**
- insist on a **regular payment of salaries** by the clubs, and introduce ways to **identify the most vulnerable players**, based on their known problems
- introduce rules to **prevent any conflict of interest with respect to sponsorship**
- introduce strict and transparent **rules for intermediaries and referees** - in case of the latter with respect to the **selection and promotion of referees**
- introduce explicit regulation of **competences of dispute resolution chambers with respect to match-fixing.**

Finally, UEFA should definitely **redesign its integrity network** and support and promote faster exchange of information among the national associations, including sharing of best practices. In this respect, UEFA should especially make sure that there are **full-time employed integrity officers within the national associations** and that these **attend regular educational campaigns organized by UEFA**, and provide reports on the situation in the area of fight against match-fixing within their country, as well as **promote national educational campaigns themselves.**

# 1. Introduction

The issue of sports competitions manipulation (hereinafter referred to as "match-fixing") has enjoyed unprecedented interest lately. From among all the examples it is sufficient to mention the Olympic Movement Code on the Prevention of the Manipulation of Competitions<sup>1</sup>), the Council of Europe (hereinafter referred to as "CoE") Convention on the Manipulation of Sports Competitions (or "The Macolin Convention"<sup>2</sup>), a related INTERPOL-IOC Handbook on Protecting Sport from Competition Manipulation,<sup>3</sup> a handbook on investigating cases of match-fixing (called Resource Guide on Good Practices in the investigation of Match-Fixing) issued by the United Nations,<sup>4</sup> or establishment of a specialized unit for investigating corruption in sport within the Europol. These international and multinational efforts are naturally also reflected at the national level – in recent years, one can thus witness a stream of new legislation, particularly at the level of criminal law, introducing the offence of corruption in sport. This process can be observed in many European (not only EU) countries. This trend is not passed over in silence by international sports and especially football movement either. For example, the Court of Arbitration for Sport (CAS) has on several occasions addressed the issue of penalizing match-fixing, as well as the procedure of investigation of such a misdeed at the level of national associations. CAS even proposed a principle under which the internal sporting regulations should not insist on a proof of guilt beyond reasonable doubt as it is in criminal law, since the sports authorities do not have such investigative capacities as the state authorities have, and should instead be inclined rather to the standard of proof used in civil proceedings - in the common law terminology called the "balance

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<sup>1</sup> Available at:

[https://stillmed.olympic.org/Documents/Commissions\\_PDFfiles/Ethics/olympic\\_movement\\_code\\_on\\_the\\_prevention\\_of\\_the\\_manipulation\\_of\\_competitions-2015-en.pdf](https://stillmed.olympic.org/Documents/Commissions_PDFfiles/Ethics/olympic_movement_code_on_the_prevention_of_the_manipulation_of_competitions-2015-en.pdf) (accessed on 31.10.2016).

<sup>2</sup> Available at:

<https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016801cdd7e> (accessed on 31.10.2016). In regard to this Convention, a conference to support the implementation of the Convention was held on 20 and 21 September 2016 in Strasbourg. The COE Convention was as of 31.10.2016 signed by 28 countries and ratified by two countries (Portugal and Norway). The entry into force of the Convention requires at least five ratifications, three of which must be ratification by the members of the COE. Despite the fact that to date this Convention has not come into effect so far, a number of Member States of the COE have already taken some steps to implement the provisions of the Convention in their domestic law, and also to strengthen the prevention, investigation and effective sanctioning of the manipulation of sports competitions. Some risk for the future of the Convention however seems to represent the current sceptical view of the EU.

<sup>3</sup> Available at:

[https://stillmed.olympic.org/media/Document%20Library/OlympicOrg/IOC/What-We-Do/Protecting-CleanAthletes/Betting/Education-Awareness-raising/Interpol-IOC-Handbook-on-Protecting-Sport-from-Competition-Manipulation.pdf#\\_ga=1.77910100.1932352419.1430747329](https://stillmed.olympic.org/media/Document%20Library/OlympicOrg/IOC/What-We-Do/Protecting-CleanAthletes/Betting/Education-Awareness-raising/Interpol-IOC-Handbook-on-Protecting-Sport-from-Competition-Manipulation.pdf#_ga=1.77910100.1932352419.1430747329) (accessed on 31.10.2016).

<sup>4</sup> Available at:

[https://www.unodc.org/documents/corruption/Publications/2016/V1602591-RESOURCE\\_GUIDE\\_ON\\_GOOD\\_PRACTICES\\_IN\\_THE\\_INVESTIGATION\\_OF\\_MATCH-FIXING.pdf](https://www.unodc.org/documents/corruption/Publications/2016/V1602591-RESOURCE_GUIDE_ON_GOOD_PRACTICES_IN_THE_INVESTIGATION_OF_MATCH-FIXING.pdf) (accessed on 31.10.2016).

of probabilities", "preponderance of evidence", or "comfortable satisfaction".<sup>5</sup> In one of the most recent CAS decisions, namely in an award of July 2016 (in the KS Skenderbeu case) CAS additionally recognized the evidentiary force of the BFDS (Betting Fraud Detection System), being a useful and widely used tool of evidence. BFDS, established in 2009, uses algorithms and mathematical models to compare calculated odds with actual bookmakers' odds to determine whether the odds in a specific minute or time period are irregular. Currently about 2,000 UEFA competitions matches are monitored per season, plus further 30,000 member associations' matches covering the top two divisions and cup competitions in each country. Its objective is to identify irregular betting behaviour, both pre-match and in-game (live), in the core betting markets, and it covers all the major European and Asian bookmakers.<sup>6</sup>

UEFA is also aware of the rapid evolution in the area of manipulation of sports competitions. This is reflected mainly in the UEFA Resolution on integrity,<sup>7</sup> but UEFA is also currently addressing these issues within its UEFA Research Grant scheme, namely having supported the Slovak Football Association's research project on match-fixing (in 2016/2017), the outcomes of which are summarized in this report.

The research project undertaken by the Slovak Football Association pursued the primary goal of updating the information on national situation of match-fixing within UEFA member associations. This update was thereby executed not only at the level of EU Member States where a similar survey was conducted in 2012,<sup>8</sup> but also at the level of other countries whose national football associations are members of UEFA. For this purpose, a questionnaire has been prepared with 32 questions, which has been sent to the employees of national football associations (UEFA members) entrusted with the matters of sports integrity ("Integrity Officers"). The questionnaire was focused on **questions of fact** (the relevance of the problem of match-fixing in each respective State), but also on **questions of law** (regulation of match-fixing at the level of criminal code, the act on sport or the gambling act, as well as at the level of internal regulations of the respective national football association), and on **forensic issues** - on the practice of investigation of match-fixing, and cooperation

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<sup>5</sup>See in particular the case of Pobeda (FK Pobeda et al. V. UEFA (CAS 2009/A/1920)), and therein mentioned previous decisions of CAS. On subsequent decisions see: <http://www.asser.nl/SportsLaw/Blog/post/the-cas-jurisprudence-on-match-fixing-in-football-what-can-we-learn-from-the-turkish-cases-part-1-by-thalia-diathesopoulou> (accessed on 31.10.2016); <http://www.asser.nl/SportsLaw/Blog/post/the-cas-jurisprudence-on-match-fixing-in-football-what-can-we-learn-from-the-turkish-cases-part-2-the-procedural-aspects-by-thallium-diathesopoulou> (accessed on 31.10.2016).

<sup>6</sup>NICHOLSON, Paul: CAS dismisses Skenderbeu appeal with key decision in battle against match-fixers. Available at: <http://www.insideworldfootball.com/2016/07/07/cas-dismisses-skenderbeu-appeal-key-decision-battle-match-fixers/> (accessed on 31.10.2016).

<sup>7</sup>Available at: [http://www.uefa.org/MultimediaFiles/Download/uefaorg/MatchFixPrev/02/07/89/27/2078927\\_DOWNLOAD.pdf](http://www.uefa.org/MultimediaFiles/Download/uefaorg/MatchFixPrev/02/07/89/27/2078927_DOWNLOAD.pdf) (accessed on 31.10.2016).

<sup>8</sup>Available at: [http://ec.europa.eu/sport/library/studies/study-sports-fraud-final-version\\_en.pdf](http://ec.europa.eu/sport/library/studies/study-sports-fraud-final-version_en.pdf) (accessed on 31.10.2016).

with various interest groups (stakeholders), namely police, prosecution, sports associations, bookmakers, betting providers and regulators, and other competent state authorities.

Although UEFA brings together 55 football associations, to integrity officers of which the research team has sent the questionnaire, out of this number, only 20 associations filled out the questionnaire at least partially, by the end of October 2016.<sup>9</sup> Hence, only information from approximately one third of UEFA members was collected. With some additional help from UEFA, four more questionnaires<sup>10</sup> were handed in. Still, it was clear that it would be necessary to use other sources of information – collected through personal visits combined with desk research, using especially the data from **reports published within a series of five workshops<sup>11</sup> organized for the CoE Members, being a part of a CoE funded project called Keep Crime Out of Sport<sup>12</sup> (KCOOS)**. Within these workshops, national experts shared experience and best practices within the fight against match-fixing (our research team member, being at the same time an expert working for the Slovak Football Association, attended the workshops on 25 and 26 October 2016 in Bucharest and on 8 and 9 November in Athens).

Based on the combination of the questionnaires evaluation, KCOOS reports and other desk research outcomes, and finally **personal meetings and evaluation of interviews performed with selected experts from selected most inspirational countries**, this final report with a number of recommendations and proposals (as specified below) has been drafted and handed in to UEFA by the 31 March 2017.

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<sup>9</sup>Norway, Denmark, Northern Ireland, Sweden, Finland, Austria, Switzerland, Germany, Malta, Lithuania, Turkey, Hungary, Italy, Luxembourg, Montenegro, the Czech Republic, Slovakia, Romania, Ukraine and the Russian Federation.

<sup>10</sup>Estonia, Azerbaijan, Latvia, Israel

<sup>11</sup>Available at:

<http://pjp-eu.coe.int/en/web/crime-out-sport/regional-seminars> (accessed on 31.10.2016).

<sup>12</sup>Available at:

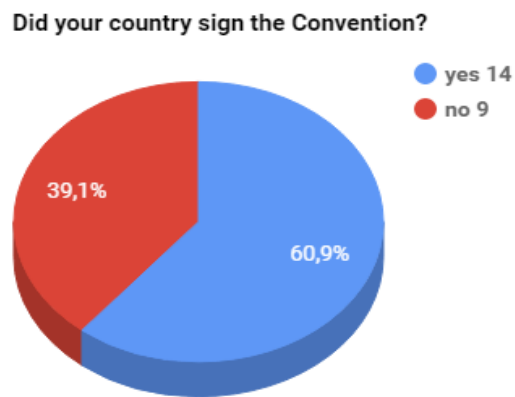
<http://pjp-eu.coe.int/en/web/crime-out-sport> (accessed on 31.10.2016).

## 2.Integrity Officers Questionnaire Evaluation

In the questionnaire sent out to integrity officers from the UEFA member associations, research team has focused on a number of basic questions, in order to assess the current situation of match-fixing in respective countries. An overview of the received answers can be summarized in the form of graphs as follows:

*(The list of all the questions can also be found as an Attachment No. 1 to this Report.)*

### **Did your country sign the Council of Europe Convention on the Manipulation of Sports Competitions ("Convention")? (23 responses)**

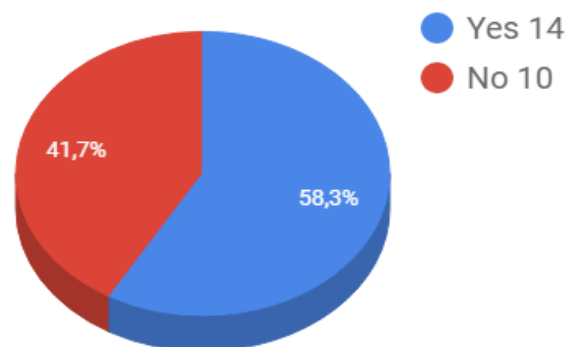


**Have any changes to your national legislation or situation in match-fixing in general taken place in your country since the 2012 KEA report?** Please see your country's profile (if applicable) under:

[http://ec.europa.eu/sport/library/studies/study-sports-fraud-final-version\\_en.pdf](http://ec.europa.eu/sport/library/studies/study-sports-fraud-final-version_en.pdf)

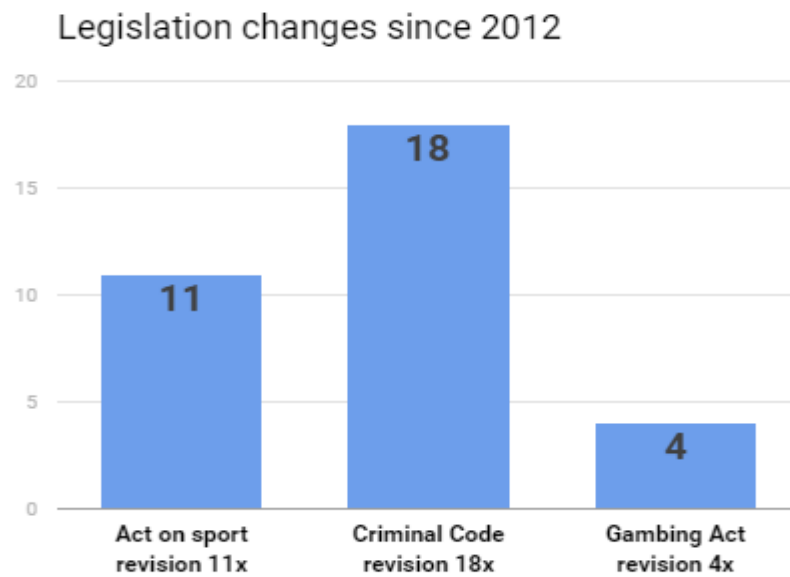
(24 responses)

Change in legislative in match-fixing in your country since the 2012 KEA report?



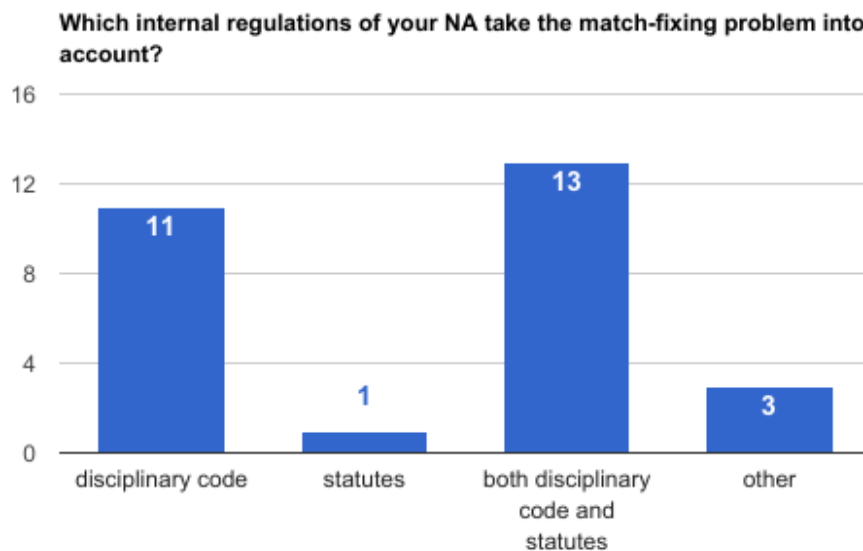


If your answer to the previous question was "yes", please indicate what legislation changes have been made. (24 responses)



Which internal regulations of your NA take the match-fixing problem into account?

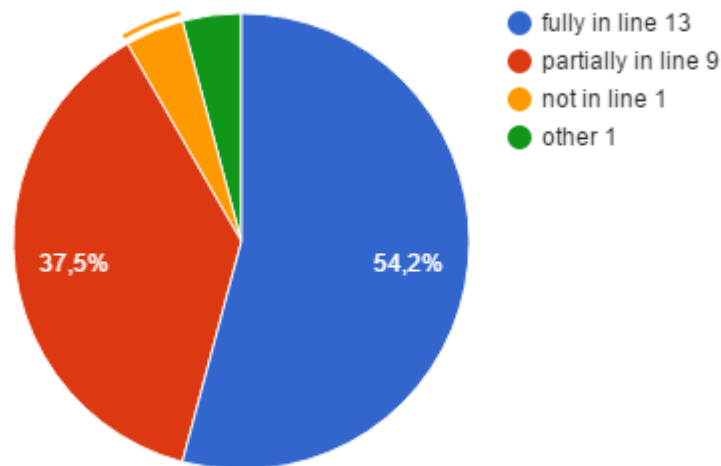
(23 responses)



**How much do these match-fixing regulations correspond with the UEFA Resolution: European football united for the integrity of the game?** You can find it at:

[http://www.uefa.org/MultimediaFiles/Download/uefaorg/MatchFixPrev/02/07/89/27/2078927\\_DOWNLOAD.pdf](http://www.uefa.org/MultimediaFiles/Download/uefaorg/MatchFixPrev/02/07/89/27/2078927_DOWNLOAD.pdf) (24 responses)

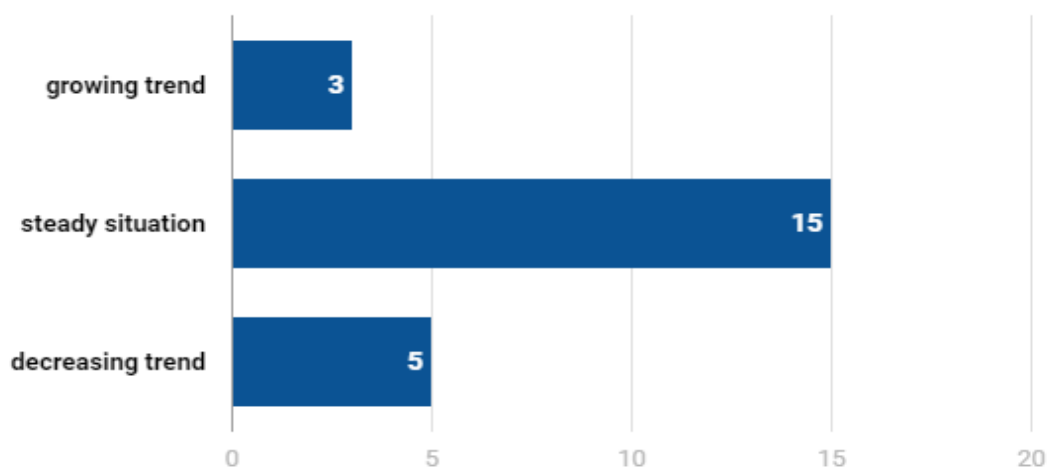
How much do these match-fixing regulations correspond with the UEFA Resolution ?



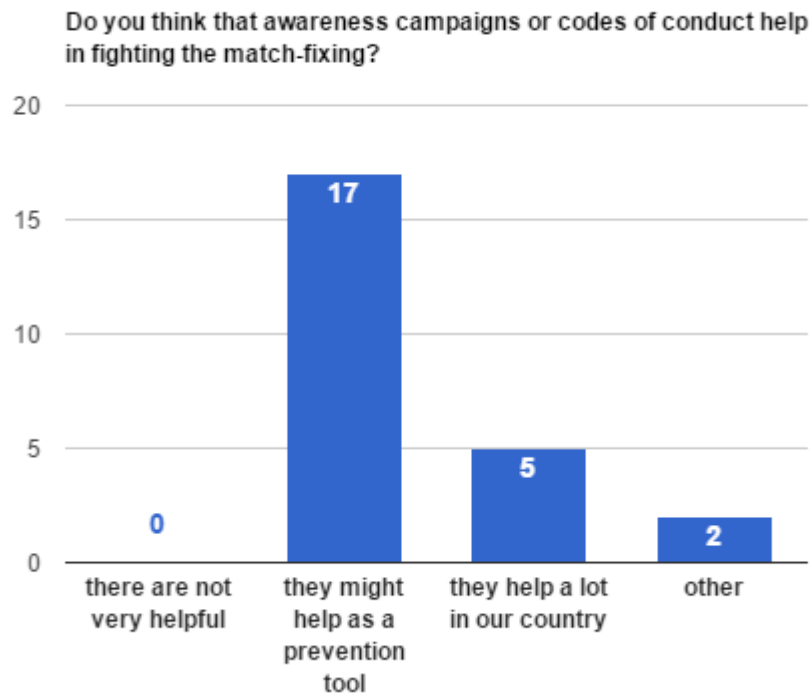
**Does the match-fixing problem in your country have a growing trend or is there a steady situation?** (24 responses)

(Decrease was reported in Switzerland, Turkey, Latvia, Israel and Italy.)

Does the match-fixing problem in your country have a growing trend or is there a steady situation?



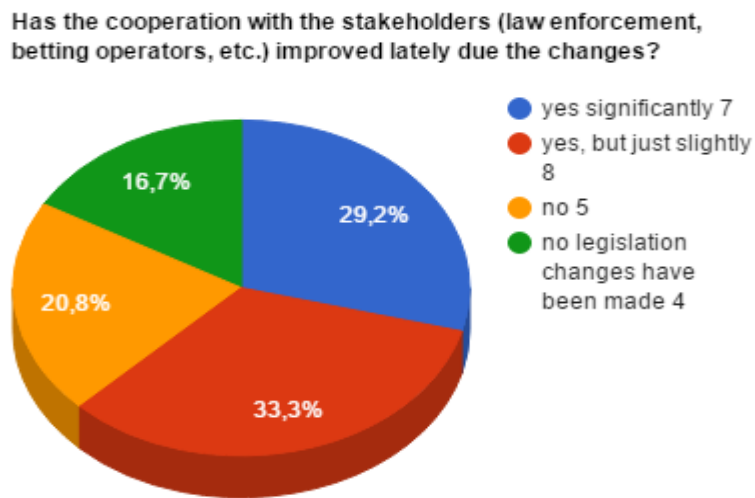
**Do you think that awareness campaigns or codes of conduct help in fighting the match-fixing? (24 responses)**



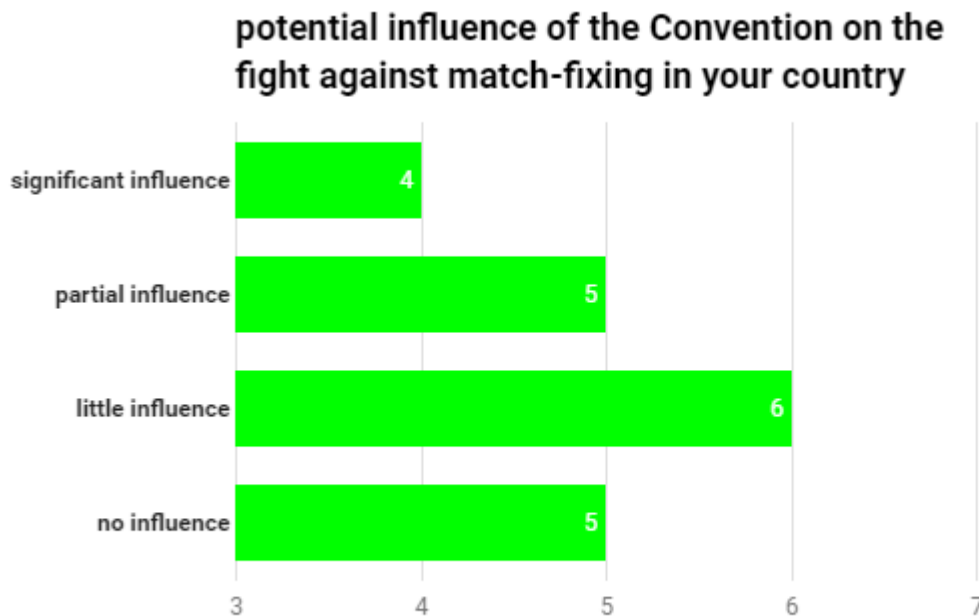
**How would you evaluate the cooperation with law enforcement authorities in the investigation of match-fixing in your country? (24 responses)**  
(The cooperation is considered perfect in Finland, Azerbaijan and Lithuania.)



**Has the cooperation with the stakeholders (law enforcement, betting operators, etc.) improved lately due to the national legislation changes, Convention or due to any other reasons? (20 responses)**

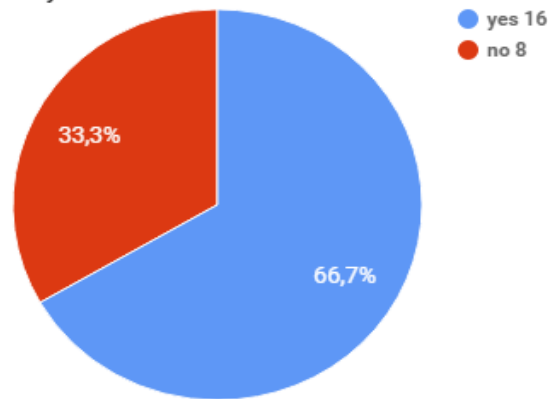


**Can you assess the potential influence of the Convention on the fight against match-fixing in your country? If your country already signed the Convention, please, assess its actual influence on the fight against match fixing in your country. (23 responses)**

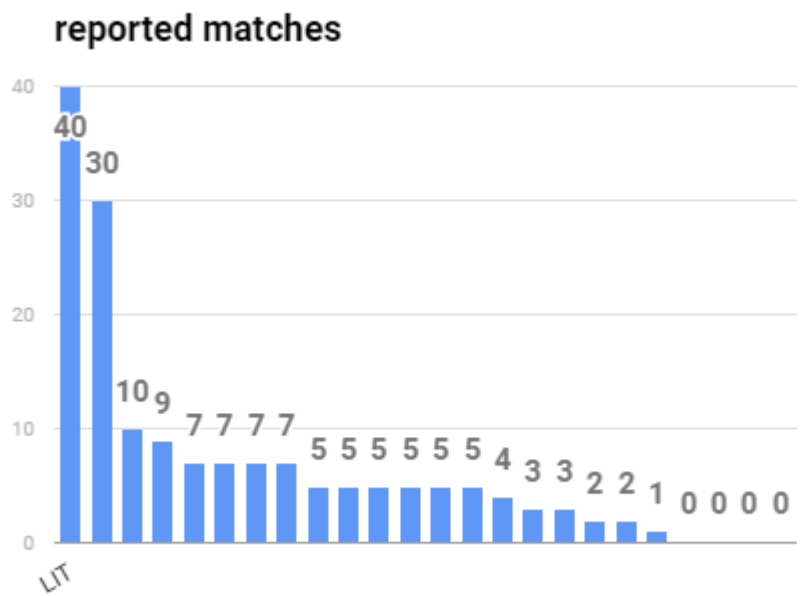


**From your point of view as an Integrity Officer, would you prefer a more detailed legally binding international regulation on match-fixing, going beyond the Convention? (24 responses)**

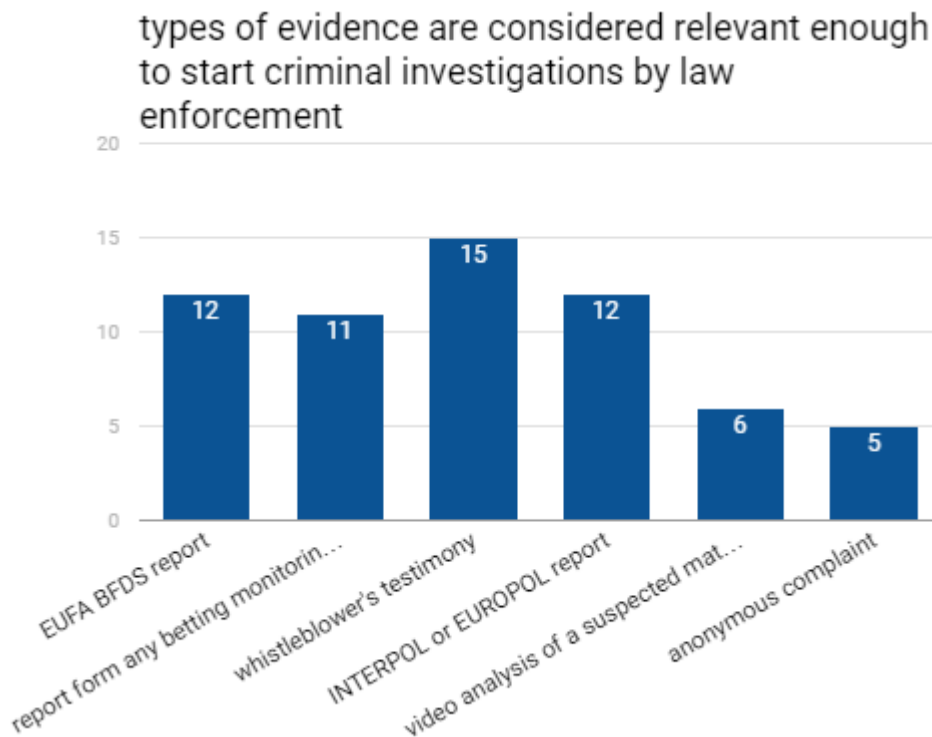
would you prefer a more detailed legally binding international regulation on match-fixing, going beyond the Convention?



**How many suspected matches (cases for potential investigation) have been reported in your country from 1 January 2015 to 31 July 2016? (21 responses)**

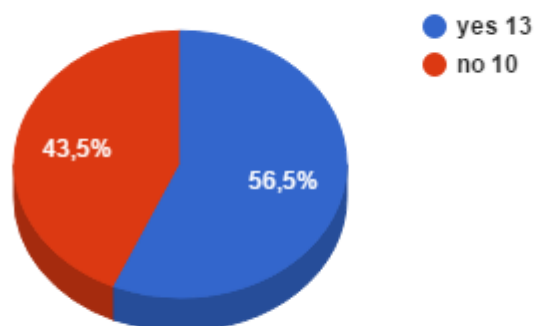


**What types of evidence are considered relevant enough to start criminal investigations by law enforcement authorities in your country? (24 responses)**



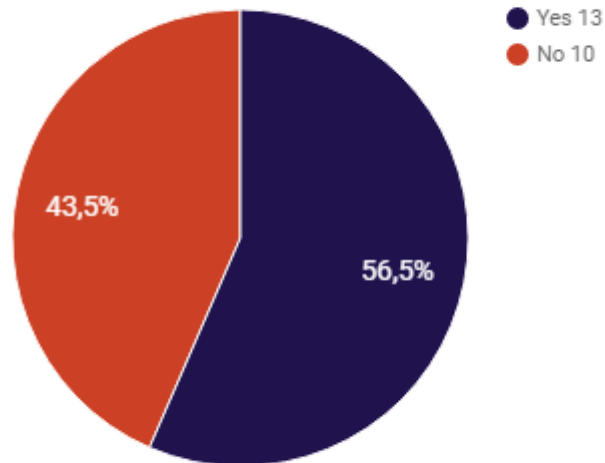
**Can criminal sanctions for match-fixing be imposed on legal entities (clubs, etc.) in your country? (23 responses)**

Can criminal sanctions for match-fixing be imposed on legal entities (clubs, etc.) in your country?



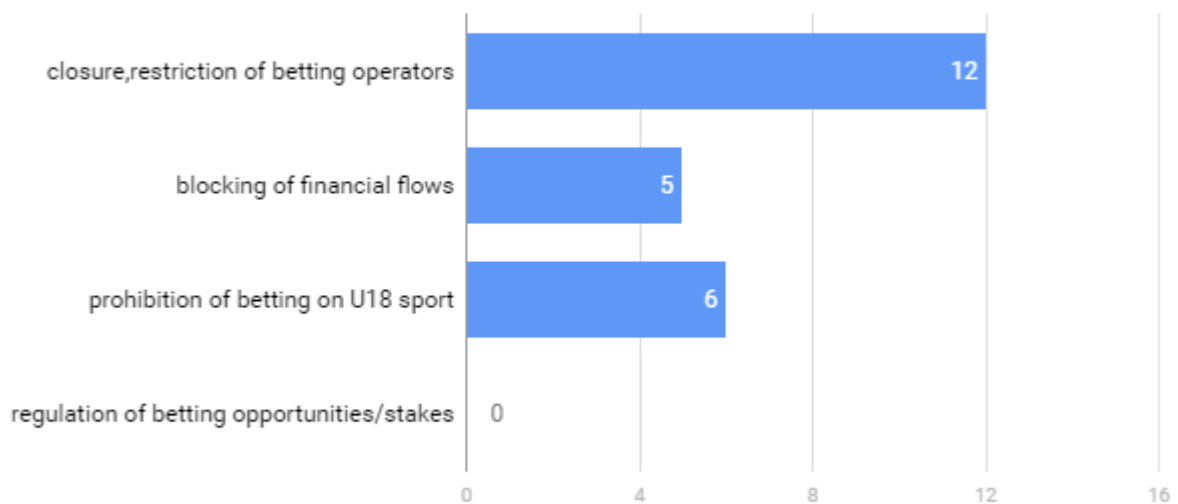
**Is betting on sports matches supervised by any specific institutions in your country? (23 responses)**

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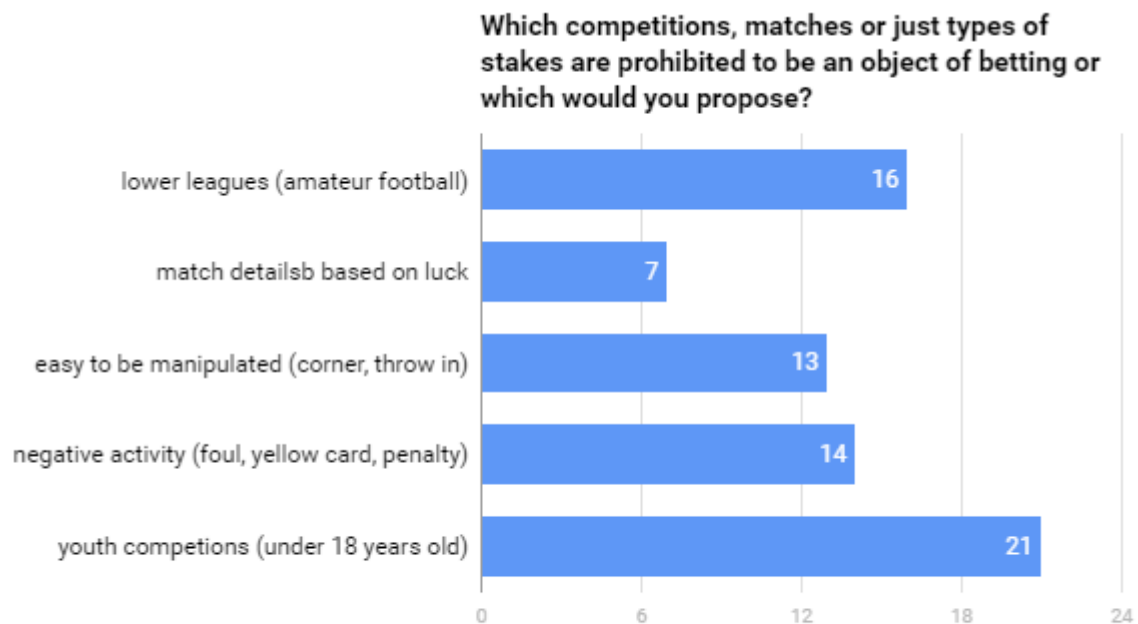


**What special regulation of betting (including the online betting) is applied by the legislation listed in the answer to the previous question? (16 responses)**

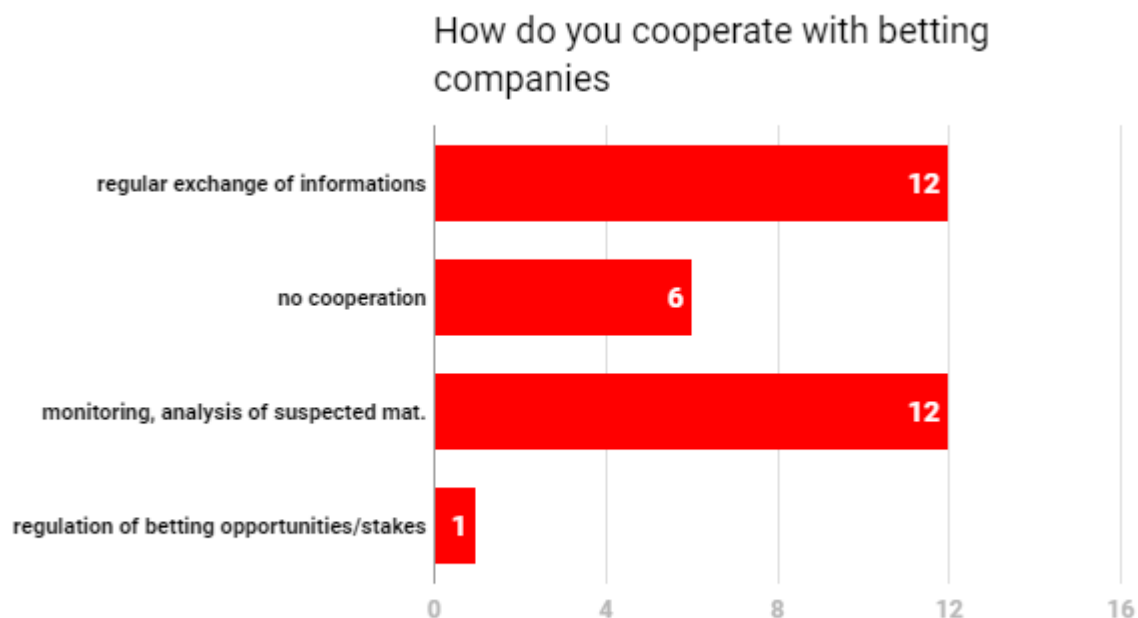
What special regulation of betting (including the online betting) is applied?



**Which competitions, matches or just types of stakes are prohibited to be an object of betting or which would you propose to be forbidden from placing bets on? (22 responses)**



**How do you cooperate with the betting industry? (24 responses)**





**What do you see as a biggest challenge/problem in the fight against match-fixing in general? What are your recommendations for the near future? (18 responses)**

Some of the most interesting responses are:

**Hungary:** *„The lesson was learnt by the cheaters. They know how to avoid to be suspicious. Instead of using official/licensed channels they started to use illegal way for earning money. The betting enterprisers want to earn money ... they do not have a code of ethic... “*

**Turkey:** *„The international aspects of it. The betting operators must be regulated, and some part of the income generated by the betting industry should be used for prevention and education purposes. There should be strict betting ban on the amateur competitions and all type of youth matches.“*

**Austria:** *„Without the support of the authorities, you have little chances for the ministry of justice and the judges, there sometimes are more relevant issues than sports fraud - no victim is damaged physically, just financial loss of the betting industry, they argue.“*

**Finland:** *„1. The lax attitude of clubs when recruiting players and building of the team i.e. the national composition of players in key areas of the pitch, 2. Poor financial management of clubs being one the basis of player involvement in match-fixing.“*

**Denmark:** *„In my view one of the biggest problems is due to the fact the betting operator doesn't really want to cooperate as being mentioned in connection with match fixing is bad for business. They only cooperate because they have to and only when absolutely needed because of media interest.“*

**Slovakia:** *„The Law on Sport was enacted in 2015 and it defines the term - “match-fixing”, which is in line with Convention. In the Criminal Code a new criminal offence - “sports corruption” has been introduced and sanctions for committing match-fixing have been included. We have implemented 70% of Convention recommendations into our legislation, but Slovakia has not signed the Convention yet. Match-fixing in our country is not the priority to many sports organizations and also the Ministry of Education and Sport, under which match-fixing agenda falls, is not doing much in this area, especially in respect of the implementation of Convention into practice. In my opinion only few people in Slovakia know about match-fixing and deal with this relatively new issue.“*

From the respondent associations' answers it is clear that in a large number of the countries there has been a **change in legislation towards a new way of sanctioning or stricter penalization of the crime of corruption in sport** (or sports

fraud, respectively, in general, the crime of match-fixing), which in most countries is considered a special type of offence. This is the case in the following countries: Denmark<sup>13</sup>, Montenegro<sup>14</sup>, Malta, Lithuania<sup>15</sup>, Hungary<sup>16</sup>, Ukraine, Turkey<sup>17</sup>, Estonia, Azerbaijan<sup>18</sup>, Latvia<sup>19</sup> and Italy<sup>20</sup>.

A similar solution is currently being under consideration in Switzerland, where it is proposed to introduce a new crime of "sporting fraud", since under the currently effective legislation and its judicial interpretation the provisions on fraud can not be applied to sports. Similarly, new legislation is also to be introduced in Germany, where it is proposed to introduce two new crimes: "sports betting fraud" and "manipulation of professional sports competitions" - in order to distinguish between the cases in which the manipulation is motivated by reasons other than betting fraud. One of the exceptions from among the respondent countries is Norway<sup>21</sup>, which does not recognize specific crimes of sports corruption or sports fraud in its criminal legislation, but instead is using general criminal law provisions on fraud and corruption. Similarly, Finland and Austria are both working only with the construction of the general crime of fraud, and Luxembourg is applying general provisions on corruption in cases of sports bribery. Finally, Romania does not have any criminal regulation of match-fixing at all.

Sweden is a specific case due to its introduction of penalization of match-fixing rather at the level of internal regulations, particularly at the level of a national sports federations'. Within its criminal legislation, it also uses only general provisions on active and passive corruption.

Quite a special solution is used in Northern Ireland, where the provisions on fraud are applied under the law on gambling (Gambling Act).

Besides the legislative regulation, all national associations introduced **internal rules** and regulations with respect to prevention and sanctioning of sports corruption – mostly in their **disciplinary codes**. Details and **recommendations** as to the scope of the internal regulation of anti-match-fixing **will be specified below** in the following chapters.

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<sup>13</sup>[http://www.ft.dk/RIpdf/samling/20141/lovforslag/L110/20141\\_L110\\_som\\_vedtaget.pdf](http://www.ft.dk/RIpdf/samling/20141/lovforslag/L110/20141_L110_som_vedtaget.pdf)

<sup>14</sup>[http://www.pravda.gov.me/ResourceManager/FileDownload.aspx?rid=226064&rType=2&file=Krivični\\_zakonik\\_Crne\\_Gore.pdf](http://www.pravda.gov.me/ResourceManager/FileDownload.aspx?rid=226064&rType=2&file=Krivični_zakonik_Crne_Gore.pdf)

<sup>15</sup><https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/af474760451611e68f45bcf65e0a17ee?positionInSearchResults=0&searchModelUUID=4b606fae-d48f-4cb8-95b7-1d0f001298bf>

<sup>16</sup>[http://njt.hu/cgi\\_bin/njt\\_doc.cgi?docid=152383.323276](http://njt.hu/cgi_bin/njt_doc.cgi?docid=152383.323276) - Criminal Code

[http://njt.hu/cgi\\_bin/njt\\_doc.cgi?docid=82785.323122](http://njt.hu/cgi_bin/njt_doc.cgi?docid=82785.323122) - Law on Sport

<sup>17</sup><http://www.mevzuat.gov.tr/Metin.Aspx?MevzuatKod=1.5.6222&sourceXmlSearch=&MevzuatIliski=0>

<sup>18</sup><http://e-qanun.az/code/11> - (Criminal Code Article 192-2)

<sup>19</sup><http://likumi.lv/doc.php?id=88966>

<sup>20</sup><http://www.gazzettaufficiale.it/eli/id/2014/10/21/14A08119/sg>

<sup>21</sup>[https://lovdata.no/dokument/NL/lov/2005-05-20-28/KAPITTEL\\_2-15#KAPITTEL\\_2-15](https://lovdata.no/dokument/NL/lov/2005-05-20-28/KAPITTEL_2-15#KAPITTEL_2-15)

( 1.corruption cfr § 387,388 2. Fraud §372,§373)

With respect to match-fixing **identification**, the respondents who have filled out the questionnaire, have identified the following as the **sources of identification** of match-fixing cases:

- UEFA BFDS report or report from any other betting monitoring system
- whistleblower's testimony or anonymous complaint
- INTERPOL or EUROPOL report
- video analysis of a suspected match

**In the process of investigation**, mostly at the internal level, but also at the level of criminal proceedings, the following **evidence** is mostly used, according to respondents:

- UEFA BFDS report
- video analysis of a suspected match
- interrogation of players or staff

Finally, with respect to **sanctioning**, it was reported that **mostly natural persons – players** are being sanctioned (mostly by suspension from playing and from the membership in a club or association), while **legal entities** (clubs) are mostly **sanctioned only internally** (see below in the chapter on directed interviews evaluation - clubs get fined, their points get deducted, their participation in competitions is terminated and they additionally get relegated to a lower league).

Apart from the request to describe the legal and factual situation in each respondent state, the research team has also asked the respondents about their own observations and recommendations on the most effective procedure for investigating and sanctioning the match-fixing. Out of the number of **recommendations, respectively national examples of potential solutions**, the following views can be mentioned here briefly as particularly inspiring:

An interesting solution was referred in the form of making the **subsidy from the state budget to sports organizations dependent on that the national sports associations introduce internal regulation against match-fixing** (this is a reported practice in Denmark and Austria).

It was also recommended to **strengthen the cooperation with bookmakers and betting operators**, which was consistently considered by the respondents as weak in cases where the State recognizes private providers (operators) of gambling services. In contrast, if a state monopoly has been established in a country, the cooperation was rated by the respondents as excellent. In this context, it could also be beneficial to use the experience of the United Kingdom or Austria, where the

**granting of licenses to gambling services operators is made conditional on cooperation and exchange of information necessary to combat match-fixing.**

A positive aspect, which was emphasized by a number of countries, is the creation of **national platforms** for the fight against match-fixing. Under the existing national experience, establishment of such a platform does not require major expenses – e.g. the platform in Norway only employs two people. Another possible solution can also be an informal platform, such as in Sweden,<sup>22</sup> or semi-official platform in the form of an NGO as is the case in Austria, where the platform is, moreover, supplemented by the existence of a specialized police investigative unit. In the Czech Republic, a special commission for the fight against manipulation of sports competition was reported as having been established recently, involving the Czech Olympic Committee, Ice Hockey Federation and the Ministries of Finance, Interior and Justice. This relatively active platform has already submitted to the Czech Parliament several proposals to amend the existing legislation, albeit so far without major results.

Finally, as some additional inspirations, proposals were presented by the respondent countries to **increase the protection of whistleblowers**, informing on crimes related to match-fixing, or to **use the profits from the levy imposed on gambling operators to finance information and prevention campaigns** against the match-fixing.

To conclude, based on the interim observations coming from the questionnaire mostly, it seems that the UEFA associations' countries share the trend of **introducing specific crimes on sports corruption and sports manipulation** notwithstanding whether they have signed or ratified the Macolin Convention or not. A second key issue clearly recognizable from the questionnaire and from comments made by respondents, as well as from the workshops organized within the KCOOS project, is the **greater importance of actual investigative practice rather than the importance of legal regulation**. Therefore, in the following stages of the research, the research team intended to pay more attention to the actual forms of investigation of match-fixing, as well as the actual **forms of cooperation between various stakeholders (e.g. within national platforms)**, and ways to strengthen and streamline the efficient cooperation in order to reach visible outcomes in the fight against match-fixing.

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<sup>22</sup>Available at:  
<http://minmatch.se/en/home/> (accessed on 31.10.2016).

### 3. Desk Research

Based on the questionnaire evaluation it seemed clear that a particularly effective means of combating manipulation of sports competitions is the establishment of "**national platforms**" for the fight against match-fixing. Therefore, within the desk research, we paid closer attention to various forms of national platforms throughout Europe, having their common basis in the Macolin Convention. In order to streamline the exchange of best practices, the CoE has also initiated establishment of a "network of national platforms", called the "Copenhagen Group". Its members are thereby ready to help potential candidates from among other CoE Member States, who may need counselling on establishment and functioning of national platforms.

The task of the National Platform under the Macolin Convention is thereby to connect primarily the entities providing services and supervision in the betting market with the sports movement and representatives of the State (police, prosecution, ministries), in order to prevent as well as effectively investigate the cases of match-fixing. Such national platforms exist so far only in a few countries and probably the most experienced are thereby the national platforms **in the United Kingdom** (of Great Britain and Northern Ireland) and **in France**.

The report of the very first workshop organized within the KCOOS project pointed out some useful recommendations, which may inspire individual Member States of the CoE in developing their own national platforms - besides other things, it is recommended that such platforms, if they are to be effective, should not have more than 25 members, and should hold meetings in person at least two to four times a year.

The platform can thereby be established ideally at the premises of main **national gambling regulator** (e.g. the Gambling Commission in the UK,<sup>23</sup> or the French Gambling Regulatory Authority ARJEL<sup>24</sup>) - a similar model is currently being developed in Switzerland. Some other countries, such as Denmark and Finland, have, in contrast, chosen to **combine the national platform with the highest authority for anti-doping**. Still, the Netherlands saw the solution in a collaboration between the respective ministry and the prosecutor's office, and Belgium in conjunction of federal anti-corruption unit with the federal prosecutor's office.<sup>25</sup> A completely different approach was taken by Austria, which has created a platform **only at the level of an NGO** called Play Fair Code.<sup>26</sup>

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<sup>23</sup> Available at:

<http://www.gamblingcommission.gov.uk/Home.aspx> (accessed on 31.10.2016).

<sup>24</sup> Available at:

<http://www.arjel.fr/-Role-et-missions-.html> (accessed on 31.10.2016).

<sup>25</sup> In Belgium, especially the establishment of a hotline and of a special website can be emphasized:

[www.footballfraud.be](http://www.footballfraud.be) (accessed on 31.10.2016).

<sup>26</sup> Available at:

<http://www.playfaircode.at/startseite/> (accessed on 31.10.2016).

The British experience thereby strongly emphasizes the **suitability of linking the platform with the gambling regulator**, respectively with the betting market, since this makes it possible, already upon granting licenses to the gambling and betting services operators, to impose on the service providers (similarly as in Norway) **a duty to cooperate and provide the required data to the national platform, which makes it a lot easier to monitor potential cases of match-fixing effectively**. In addition, many operators have also voluntarily signed memoranda of cooperation (understanding) with sports organizations (National Sports Associations) to exchange information on potential manipulation and they also participate in activities of the UK Betting Integrity Forum,<sup>27</sup> which presents the very national platform bringing together representatives of the gambling regulator, sports movement, gambling (and betting) service providers and state authorities, particularly the police. E.g., in case of the national platform in Belgium, it comprises the representatives of:

- authorities (governmental, non-governmental),
- sports federations,
- athletes,
- prosecutors,
- police,
- event organizers.

Similarly, in Denmark, the platform consists of:

- Ministry of Culture,
- Danish Gaming Commission,
- Ministry of Justice,
- Danish National Police,
- DOGA - Danish Online Gambling Association,
- Danish state lottery,
- Olympic Committee and Danish Sports Confederation,
- Danish Football Association,
- Anti Doping Denmark (acting as a Secretariat).

Probably **the most inspirational national platform is the French one**, being established by an Agreement between the Minister for Sports and ARJEL, under the chairmanship of the Minister for Sports. According to the gathered desk research data and a KCOOS workshop report, it consists of two Boards - the Coordination and Prevention Board, and the Monitoring Board, with plenary sessions held twice a year. The Monitoring Board represents a system enabling to share and circulate information among stakeholders in charge of detection of manipulations. ARJEL additionally **monitors the French online sports betting market through an**

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<sup>27</sup> Available at:  
<http://www.sbif.uk/home.aspx> (accessed on 31.10.2016).

**administrative partnership between ARJEL and FDJ (Global Lottery Monitoring System)**, which enables real time exchanges to obtain an overview of the situation on the national sports betting market, both online and offline, while ARJEL has also developed its **own odds analysing tool (software)**. Using the gathered raw data, ARJEL has developed **monitoring indicators enabling to identify attempts of betting related manipulations**.

Within **prevention tools**, ARJEL also **ensures that no conflicts of interests exist between the licensed sports betting operators and the sports competitions' organizers**. Finally, as a **gambling regulatory authority, ARJEL can prevent bets to be placed on competitions which entail higher match-fixing risks**.

Additionally, the Central Service for the Prevention of Corruption (special unit of the Ministry for Justice), the Central Service for Races and Games (specialized police service) and the National Financial Intelligence Unit (Tracfin) are part of the French national platform and in charge of the fight against corruption and fraud. The reasonably **suspected cases of manipulation are forwarded to the prosecution office**.<sup>28</sup>

Still, it should be additionally kept in mind that **not every instance of manipulation of sports competitions is necessarily related to betting. Other types of manipulations should also belong to the competence of the national platform established to combat match-fixing**.

Hence, based on the reports from the workshops taking place within the CoE-funded project KCOOS, and based on the very CoE Convention against manipulation of sports competitions and related desk research, **it seems that the most valuable and efficient way to tackle the match-fixing is – besides introducing legislative changes in order to punish the perpetrators of match-fixing as criminals – the establishment of "national platforms" for the fight against manipulation of sports competitions**. Still, to collect more detailed information and knowledge on the activities of the platforms as well as on investigative practice, it was clear that further in-depth research will be necessary to be conducted in person in the selected countries and institutions.

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<sup>28</sup>KCOOS workshop report.

## 4. Directed Interviews Evaluation

Since the number of filled-out questionnaires was relatively low, other supplementary methods such as the already mentioned desk research and the analysis of outcomes of the KCOOS project were necessary. Based on both the evaluated Questionnaires as well as on the KCOOS project reports and own desk research, a number of UEFA countries<sup>29</sup> was identified as worth personal visits in order to collect more in-depth information on the identified problems, risks, as well as best practices and recommendations.

Altogether, **relevant representatives were interviewed from 7 countries (6 were visited personally and 1 interview has been held via conference call)** in the period from January 2017 to March 2017, with a view of closer examination of (1) the **functioning of national platforms**, (2) of the **collaboration between stakeholders in the investigation of match-fixing**, (3) regulation of **whistleblowing** in relation to match-fixing, as well as (4) the **forms and scope of prevention campaigns**.

Interviews were performed in the following countries, with the following persons:

### Denmark:

1. Henrik Kjær Jensen (Danish FA integrity officer)
2. Mikkel Larsen (Public affairs consultant - NOC and Sports confederation)

### United Kingdom:

1. David Newton (former FA integrity officer, Head of FA Player Status & Competitions)
2. Nick Olivier (Senior Intelligence Officer, Sports Betting Intelligence Unit - Gambling Commission)

### Netherlands:

1. Wouter Boshuis (Netherlands FA integrity officer)
2. B.G. J. A. Wassenaar (Fiscal Information and Investigation Service of the Netherlands)
3. J. C. van den Broek (Prosecution Office of the Netherlands)

### Belgium:

1. Thibault De Gendt (FA integrity officer)
2. Eric Bisschop (Federal Prosecutor Office)

### Romania:

1. Costin Negraru (Integrity Officer)

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<sup>29</sup>Denmark, United Kingdom, Netherlands, Belgium, Romania, France.



2. Doru Gheorghiu (Chief Executive Officer of Romanian BOOKMAKERS - Betting Operators Union)
3. Odeta Nestor (Chief Executive Officer of National Gambling Regulator - NGO or ONJN)

**France:**

1. Corentin Segalen (ARJEL - Coordinator of the Operational Board)
2. Christophe Vidal (ARJEL - Deputy Coordinator),
3. Coline Duquet (ARJEL - European and International Affairs Department)
4. Romain Noël (French Olympic committee)

**Norway:**

1. Henrik Nordal (Norwegian Gaming Authority)

The following information was collected within the interviews, as summarized below:

**General Remarks**

In all interviewed countries, a **scandal surrounding an actual uncovered case** was considered the most efficient way to **raise the awareness level of match-fixing in the respective country**. France mentioned the scandal in handball in the Karabatic case. Romania in contrast identified a general national phobia against corruption, something like a general “presumption of guilt” in the eyes of public. To raise the awareness level of players and other persons involved in sports, as well as of public, a number of **educational campaigns** was introduced in the interviewed countries, evaluated as being of importance and having positive effect in this respect.

In general, all interviewed experts from the abovementioned countries consider **the situation of match-fixing in their country as being of a steady nature**, without any growing or decreasing tendencies, however, pointing to the fact that **precise information is often missing**.

In order to tackle the problem, **an institution (office) of integrity officers** was introduced in France for all the major sports, counting altogether 18 officers. In Denmark, only football has its own integrity officers, and the National Sports Confederation (supreme body of sports in Denmark) employs additionally one integrity officer for all the remaining sports. In the UK, Gambling Commission employs its own integrity officers. Still, in general, in most countries this institution (office) is not used by other sports than football.

Concerning a potential difference between **amateur and professional sports**, the threat was identified as more acute in case of amateur sports, but more importance is being given to the professional sports.

Besides the awareness raising, it is mostly **changes in legislation** (act on sports or Criminal Code) and in internal rules (Disciplinary Rules or Codes of Ethics) that the countries employed as a useful tool in the fight against match-fixing. However, the

**most efficient tool is generally considered to be a national platform** established in order to streamline the fight against match-fixing.

### Investigation

With respect to practical aspects of match-fixing investigation, **cooperation with law enforcement authorities** was mostly considered by the interviewed experts as satisfactory. However, it was thereby emphasized that this is the case mainly since national platforms were established, confirming thus their actual importance in the fight against match-fixing. Still, **match-fixing seems not to belong among the priorities of the police or prosecution** in any of the interviewed countries. Instead of being a police investigation, the **fight against match-fixing must therefore mostly be held as internal investigation by national associations**, which do not dispose of the same competences and investigative powers as the police or prosecution officers do.

On the other hand, possible police investigation and prosecution is usually taken into account by the disciplinary committees (or other investigative bodies) of the sports associations, which often upon consultations with the police impose a **disciplinary sanction prior to any criminal sanction being imposed**. This approach is also preferred by UEFA.

The most **relevant evidence** on match-fixing is thereby a report from **betting monitoring and witness' testimonies, whistleblowers' and the accused persons' testimonies or video analyses of suspicious matches**. Especially the **BFDS reporting system is of great use**, as well as **INTERPOL or EUROPOL reports**. Certain shortcomings were mentioned in this respect with regard to **whistleblowers' protection** - still, anonymous whistleblowing works very well in Denmark (see below) and in France, which could serve as an example for new regulation here. In terms of **cross-border cooperation, problems were identified mainly with regard to competence issues - since the police usually seeks contact with police corps** rather than a contact with a national platform or a national association.

Finally, concerning sanctioning, **legal entities (clubs) are usually sanctioned only at the internal sporting level** - by deduction of points, financial sanction, or relegation to lower league, etc. It is mostly individual persons, and from among these mostly players, that get sanctioned both criminally and disciplinarily (internally). **Criminal as well as internal (disciplinary) sanctions imposed on individuals are thereby considered strict enough in France** (imprisonment of up to five years and a fine of up to 75.000,- EUR) **and Belgium** (imprisonment and fine of up to 50.000,- EUR), **but not strict enough in Norway and Denmark**.

### National Platforms

As far as the national platforms for fight against match-fixing are concerned, this institution is perceived overall by all experts as **an important step in the anti-**

**match-fixing campaign.** In most cases, the platforms combine the national police corps, ministry for sports, betting operators, betting regulators and representatives of the most important national sports associations (mostly the national football association and the Olympic Committee). Inclusion of players' representatives is perceived as problematic - half of the countries interviewed refused this idea, while the other half was inclined to involving players.

The platform is **hosted in the interviewed countries either by the national betting regulator or by a ministry** - however, it was emphasized in this respect that **the platform does not need any permanent staff or offices, as it is rather important to regularly meet and discuss the problems within the stakeholders involved.** The financial argument of any governments against establishment of a national platform can thus be defeated quite easily. Still, of course, it would be very much welcome to dispose of the same amount of funds in fight against match-fixing as it is the case with the fight against doping, but this unfortunately does not seem to be viable in the short term.

The **competences of the platform are again not that important in terms of having any specific investigative powers,** interviewed experts claim, as it is rather important that the stakeholders know whom to contact in case of any problems.

It was also emphasized that the platform should form **sub-commissions in order to tackle specific issues,** that may not be directly interesting for all stakeholders.

A major problem identified emerged in connection with the **personal data processing,** since in Norway it was thereby ruled that the personal data processing is allowed by the Platform for the purposes of fight against match-fixing.

The Platform is considered very important also with respect to **international cooperation and information exchange.** For example, the Copenhagen Group helps in identification of national contact points in case a problem occurs, the stakeholders know whom to turn to, whom to contact.

However, it was admitted by the experts that some **betting operators are not fully willing to cooperate** both at the national as well as international level.

## **Betting**

At the national level, **fight against match-fixing comes usually hand in hand with the betting regulation.** Betting operators are mostly obliged to report suspicious betting patterns. However, a certain degree of mistrust towards betting operators is present, whereby the **national platform could play the decisive role of an independent supervisor of betting operators,** especially if involving also the representatives of betting operators within the platform itself. So far, regulators are mostly controlled only by the betting regulatory body, which can withdraw or terminate the licence issued to betting operators in case of a relevant failure being identified. However, betting regulatory bodies are in general not specializing in match-fixing detection and can not fully meet the expectations imposed on a national platform under the Macolin Convention.

Still, it was recommended by the interviewed experts from different countries that **betting regulators themselves should develop necessary information systems and monitor closely all the betting opportunities (stakes) being offered, in order to identify potential suspicious betting patterns.** Of great help is thereby at the national level a limitation of betting providers to **national providers, i.e. providers having a seat or at least licence issued by the country where the service is offered.** This limitation and exclusion of illegal, unlicensed or foreign providers is mostly reached through direct and indirect **restriction of access to the national betting market, blocking of financial flows** between illegal sports betting operators and consumers, as well as through **prohibition of betting on youth sports competitions** (e.g. players under the age of 18) and **other restrictions of betting opportunities (stakes)** (betting on yellow cards, fouls, corners, coin toss, etc.). In the latter respect, in most of the countries interviewed, betting is prohibited in connection to:

- lower leagues (amateur football)
- match details based purely on luck (coin toss, choice of the side)
- match details which are easily to be manipulated (corner, throw in)
- match details based on negative activity (foul, yellow card, penalty)
- youth competitions (under 18 years)

Finally, it was pointed out, that in general, **risks are mostly identified only after the relevant game or match, instead of employing greater precaution measures.** It is only ARJEL, the French betting regulator, where risk is assessed even prior to games and tournaments.

At the sports autonomy level, where UEFA could have a word in the world of football, **precautions with respect to betting mostly take a form of prohibition for players to use betting services only.** This rule itself is thereby often misunderstood by the players as well as by the public, claiming the players should be allowed to bet on their victory, without realizing that this can be achieved through agreement with the opposing team, sharing the profit with the other team. ARJEL as well as the UK Gambling Commission are regularly performing **checks in this respect to find out whether the players (or other sportspeople) have any betting accounts open with the betting operators.**

### International Level

Albeit it was considered as worth a try to establish also an **international platform** to tackle the problem, the interviewed countries were aware of the problems of establishment of such a platform as well as of problems connected to potentially uniform rules in Europe for all sports and countries; therefore, **instead, efficient cooperation between national platforms** was emphasized as a relevant tool, mostly in the form of information exchange between the states authorities and respective stakeholders. **Deficiencies in cooperation were namely identified as being a major problem** (besides the lack of uniform rules) **in the fight against**

**match-fixing in Europe.** Cross-border cooperation is thereby absolutely necessary due to international dimension of the crime, and also due to the sophisticated methods used by the manipulators. In this respect, the countries appreciated the UEFA efforts and initiatives, but also pointed to the **role of European Parliament in raising the awareness level of the problem connected to cross-border investigative cooperation within the EU.** With regard to UEFA, it was also recommended to **redesign its integrity network**, in order to initiate more efficient exchange of information between national associations.

### Summary per country

#### **Norway**

Experts interviewed in Norway highlighted three ways of tackling the problem of match-fixing - prevention, detection, and sanction. Most important for them is the detection, at least for now. Thereby, it was emphasized that only football federation has an integrity officer, while other sports lack any relevant employees or officers.

In 2012, an action plan against sports corruption was introduced after a major case and related scandal - this has led to the establishment of national platform for fight against match-fixing.

A major problem related to establishment of platforms is recognized in the fact that many of the platforms do not have enough legal basis and lack competences to effectively tackle the problem of match-fixing. The platform in Norway additionally identified a need to establish subcommittees within the platform in order to better analyse and investigate information, not just to share it. Important to note in terms of sharing the data, no problem emerged in Norway with exchange of personal data, since Norway changed the respective law before establishing the platform.

A positive aspect of Norway's system is also the strong whistleblower protection and attempt at establishing a large database of information connected to match-fixing.

Besides the platform, members of parliament were also trying to find solution for prevention of illegal online betting in order to better regulate the betting sector, which is closely linked to the match-fixing issue. National betting regulator also serves as a host for the national platform in Norway, sharing the main common target - detection of match-fixing and of suspicious betting patterns.

Finally, a major problem was identified with respect to proper investigation - the platform is vested with relatively restricted competences, while both Europol and Interpol are considered rather ineffective, since they just serve to share information and can not help with the proper investigation and cooperation. Still, in case of cross-border problems, it is necessary to cooperate with Europol, which makes it quite difficult to reach the outcome. On the other hand, cooperation within the Copenhagen Group so far serves only for sharing good practice and not for investigative cooperation. Nevertheless, the key problem of match-fixing in general is precisely the problem of information sharing. It was thereby noted that every country is just reactive and not proactive, what is important to change, experts claimed.

## Belgium

In Belgium, not many match-fixing cases have been identified so far, whereby the situation is considered steady. Most problems with match-fixing occurred previously in tennis. Despite of that, it is mostly the national football association which focuses on prevention in this context, while other sports federations do not have any integrity officers appointed. Any cooperation between different sports is thereby lacking and also the communication between public authorities and national sports federations represents a major problem. A problem was identified also with respect to the national platform (under the Ministry of Justice) as there is namely no representative of betting companies involved, whereby cooperation with them is crucial.

The interviewed experts also stated that there is a need for legislation change - there are attempts to enact a special law on match-fixing, albeit current criminal sanctions are perceived as satisfactory - imprisonment and fine up to 50.000,- EUR.

Within the internal sports rules in football, Belgium introduced a **principle that if it is revealed that the board of the club was aware of match-fixing, such a club will be automatically relegated to a lower league**. It was also pointed out that **influence of sports agents represents a risk that should be paid attention to in the internal norms and practices**.

## Romania

In Romania, after the establishment of the national gambling regulator (NOG) with 200 employees, and after the new regulation of online gambling came into force in 2015, the revenues of the state from licenses and authorization have been raised by 73 million EUR in the 1<sup>st</sup> year (including penalties from the past). Hence, regulation of online betting services and exclusion of illegal service providers from abroad can visibly have a positive impact on the state budget besides being a tool to prevent the match-fixing practices. Currently, approximately 1000 online gambling operators are on a blacklist published on the website of the NOG.<sup>30</sup>

Every stake in Romania **is monitored in time on-line and is saved and registered in history, including the ID of successful bettors**, as this system has been initiated by Romanian Bookmakers. Also the project aimed at the **training of police officers and other law enforcement authorities** is being currently prepared.

Betting operators are thereby in general willing to cooperate within the investigations, but they refuse any restrictions on stakes, claiming this is against the principle of gambling and betting business and free market.

With respect to internal **sporting rules and possible action by the UEFA, it was proposed to improve/redesign the integrity network**, and it was also **proposed that UEFA streamlines the issue of exchange of information among national associations with respect to cross-border match-fixing**.

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<sup>30</sup><http://www.onjn.gov.ro/>

## Netherlands

In the Netherlands, investigators are trying to trace money transfers connected to match-fixing with the help of financial police. Betting companies are in general not trusted as partners in the fight against match-fixing.

## United Kingdom

Population in the UK trusts the sports (and particularly football) competitions taking place in the UK, and bet large amounts of money on sports results regularly. The situation around match-fixing is thereby considered steady in the UK. The overall number of cases is rather low, albeit the number of reported suspicions is rising – due to the obligation of betting operators to report any suspicions.

Although UK has not signed the Macolin Convention, it has established a national platform for fight against match-fixing. The national platform in the UK is the SBIU (Sport Betting Integrity Unit), but investigations themselves are held by the UK Gambling Commission. The most important concern about the platform is claimed to be the fact that the representatives of various sectors and industries can communicate with each other.

Since 2014 a change in betting regulation took place in the UK, requiring betting operators not having their seat in the UK to apply for a British licence, should they wish to provide services to British citizens. Each employee of a betting operator is thereby under obligation to report any breach of the prohibition by players and association members to place bets on football matches. Betting operators are in general under obligation to report any suspicions concerning potential match-fixing. So far, there were 30 notifications concerning match-fixing from the betting operators.

It is foremost the Betfair - betting provider that is being monitored. However, it is under obligation to protect personal data and can hence only provide some general information on betting from abroad, without revealing the identity of betting service users. Within the UK, on the other hand, the Gambling Act as well as **internal rules of the national football association allow for personal data processing for the purposes of match-fixing investigation.**

**Educational and awareness-raising campaigns** are also rather effective and popular in the UK - even going as far as to the 5th league. Altogether 82 out of 90 professional football clubs already took part in the campaigns. Some clubs even run their own educational campaigns for their players and employees. Youth academies are also under obligation to educate the players in respect of match-fixing.

Concerning other sports than football, some of the sports are rather lagging behind, not having any **integrity officers** due to financial reasons - e.g., while horse-racing employs a number of integrity officers, basketball employs none.

Problems in practice have to do mostly with the international cooperation - however, this could only become perfect should all the countries have the same laws on match-fixing, betting and sharing of information.

Particular problems are those that have to do with modern technologies - manipulators use the latest technology and encrypt their communication on match-

fixing, which slows down the investigation process. Furthermore, in the UK, local police has limited funds and possibilities to investigate match-fixing cases that reach beyond their district. National police does not consider match-fixing its priority.

At the level of internal sports investigations, other problems emerge: foremost that of slow speed of investigation, while **players do not get suspended during the investigation procedure, which may take even 18 months. On the other hand, punishments and practices being a result of the investigation are rather strict - players get punished even for failing to report an attempt at manipulation when the players were approached by third parties.** Failure to notify such cases lead to sanctioning the players in the past.

Still with respect to investigation, it was also recommended that **disciplinary committee or integrity officers within the national association are equipped with necessary competences, e.g. to suspend players, search and seize the property of players for the purposes of investigation, etc.**

## France

In France, in 2010 a new Act on online gambling was enacted, whereby the ARJEL as a supreme authority for betting and gambling was established.

In 2012, an Act on the threatening of sports ethic and athletes' rights was introduced, which provides for the offence of active and passive corruption in sport with a potential sanction of imprisonment of up to five years and a fine of up to 75.000, EUR - being one of the most strict laws in Europe. In 2014 a 2016, additional laws on competences of ARJEL were introduced. It is now mandatory that betting companies (providers) have to sign an agreement with an organizer of a competition about their betting options offer.

ARJEL is also publishing a list of competitions and types of bets which are allowed in general - in France it is e.g. prohibited to bet on "U18" games, some match details and also on amateur matches.

## Denmark

In general, awareness level on match-fixing is very high in Denmark, there is a lot of **debates, campaigns and articles in newspapers about match-fixing.** Every two years educational campaign for players are held, even for sportspeople outside football.

There has been a major problem within the national platform in respect to who should perform investigations and how to handle the information gained within the platform. The football association would like to perform its investigations separately and independently, but Anti-doping Denmark usually wants to take over the initiative. Additionally, cooperation with betting companies was identified as being one of the major problems in Denmark - betting operators do not wish to be connected with match-fixing and hide from investigating the problem.

Of special interest is a very good **system of reporting.** When someone reports through the newly established reporting system, their **IP address cannot be tracked and it is possible to communicate with the informers through a virtual mailbox**



without knowing their identity. At the internal sports level, all members of the Sports Confederation (supreme umbrella body in sports in Denmark) have introduced **uniform disciplinary rules against match-fixing**, and **one integrity officer was appointed within the Sport Confederation to act on behalf all sports that have no internal integrity officer**. Finally, an **independent sports Tribunal for match-fixing** (under the National Olympic Committee and the Sport Confederation) was established to handle the cases.<sup>31</sup>

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<sup>31</sup>[http://www.dif.dk/da/foreningsliv/stop\\_matchfixing](http://www.dif.dk/da/foreningsliv/stop_matchfixing)

## 5. Problems and Risks Identified at the National and International Level: Summary

Based on the information gathered from the questionnaires, the desk research and interviews undertaken, a number of overall problems and risks were identified at the national or international level with respect to match-fixing, which can be summarized here in a brief manner. **Only some of the problems are thereby of such a nature that the football movement or sport on its own can contribute to their solving. Mostly cooperation and support from governmental and international (or European) authorities is necessary to tackle the identified issues.**

### General Remarks

From among the most general problems, the following can be mentioned in the first row:

- The **number of reported suspicious activities** overall is quite small, what might have something to do with lacking protection of whistleblowers, or with a lack of anonymity in reporting.
- **Legislation** on match-fixing is often deficient.
- Financial aspects (**funding**) of the fight against match-fixing is far from comparable with the attention paid to doping.
- **Awareness level** is also very low - even the players do not understand why they can not bet on their matches (mostly on the victory of their own team). Awareness campaigns must be necessarily introduced and aimed at players, employees of sports clubs and sports associations in general.

### Investigation

In general, **speed and reaction time** is mostly perceived as a problem with respect to effective investigation as a part of the fight against match-fixing. This has various reasons and contexts:

- a) The manipulative **methods** are becoming more and more **sophisticated** (using encrypted communication services such as Viber) and it is getting more and more complicated and time-consuming to investigate the illegal manipulative practices.
- b) The match-fixing practices often have an **international and cross-border** character, which makes the exchange of information and investigative cooperation more challenging.

Additionally, match-fixing is often not perceived as a direct and imminent danger to the society by the police and prosecutors, hence it does not belong among their priorities. Additionally, police officers as well as prosecutors and judges themselves

do not possess necessary knowledge on match-fixing. Even at the level of ministries for sport and interior, **knowledge on match-fixing** is rather limited.

Another closely related problem is that police mostly does not **cooperate effectively** within its investigations **with the national sports associations**. In fact, often in case where there is not enough evidence for criminal proceedings, disciplinary sanction could still be imposed by the national association, should the police or prosecutors provide to the national association and its disciplinary bodies information they have collected in the investigation process. However, sometimes this is a problem due to **lack of trust** on the side of the police towards the representatives of sports associations.

### **National Platform**

An efficient way to tackle the problem of match-fixing at the national level seems to be foremost the establishment of a **national platform** for the fight against match-fixing. The problem here is that most countries have not yet established such a national platform, disregarding whether the state has signed and ratified the Macolin Convention (recommending the establishment of such a platform) or not. Even in those countries where the platform was established, problem is in the scope of its competences - it is namely not uniformly given whether the platform should also possess investigative **powers**. With respect to competences of the platform, it is in addition not always clear under what rules should the platform be entitled to **personal data processing** - this issue should be regulated explicitly in the national legislation already at the moment of establishing the platform.

Concerning the **members (composition)** of the platform, it is questionable again whether players' representatives should also be involved in the platform. Some countries are strictly opposing this idea, while other countries appreciate their insider knowledge.

It is also recommended that the platform has no more than 15-25 members - otherwise the efficiency of communication is limited, and in any case it is proposed that rather a number of **sub-committees** should be established for handling individual problems related to match-fixing.

All members of the platform should thereby be highly motivated to fight the match-fixing, which may be especially problematic in case of members representing the betting service providers.

### **Betting**

In respect of betting, it was repeatedly mentioned by the questionnaire respondents and interviewed experts that the cooperation with **betting operators** is rather weak in general. These are namely not motivated enough to cooperate and to report suspicious activities. They may even be often in a conflict of interests.

**Betting regulation** is thereby one of the crucial tools to fight match-fixing, besides the establishment of the national platform. However, it is problematic how to prevent betting by **players through an intermediary**, and how to prevent betting through **illegal betting service providers**, mostly seated in countries that are difficult to cooperate with in terms of police investigation of match-fixing (e.g. in Asia).

Only of minor efficiency might be **limitation of betting** on certain levels of matches or tournaments (below 18 years of age, amateur competitions, friendly matches, or betting on easily manipulated facts). As mentioned above, the more uniform the betting regulation of all the States is, the stronger global weapon against match-fixing could there be.

### **International Level**

Finally, at the **international level**, problems even multiply since there is no international or European **authority comparable e.g. to WADA** (entrusted with the anti-doping agenda), with powers to fight match-fixing. There is even no central database of criminals and punishments, and also the cooperation via Europol and Interpol is far from being fast and efficient, consisting mostly only in the information-sharing among the national police departments.

It is thereby not realistic to expect that any uniform international legal regulation will be introduced in this respect at the International or European level any time soon - the will is lacking on the side of states, and even in case there would be the will given, each state and region shows numerous specificities with respect to match-fixing and thus a completely uniform solution may not even be possible. Additionally, as correctly pointed out by the experts from the UK, to achieve certain level of uniformity and efficiency, all the states would have to introduce uniform acts on gambling and betting, as well as on match-fixing and on exchange of information.

## 6. Solutions: Best Practices within the UEFA Associations

While in the previous chapter problems were enumerated where sports movement can not change much on its own, in the present chapter we shall summarize the **best practices with respect to anti-match-fixing, that are mostly in hands of the sports movement**, and hence can also be streamlined and promoted by an international (European) sports confederation such as UEFA. In this line we shall introduce some of the most inspirational internal sporting rules aiming at the fight against match-fixing at the national level, with a view of their possible extension to an international or European dimension.

The selected best practices tackle only some of the abovementioned problematic issues (general problems, investigation problems, issues of a national platform, betting, and international problems). They will be summarized here according to their country of origin (per country):

### Denmark

One of the most inspirational UEFA member associations' countries with respect to internal rules on anti-match-fixing is undoubtedly **Denmark**. First and most importantly, Denmark has introduced **uniform internal rules on match-fixing**<sup>32</sup>, binding for all sports in Denmark.

Additionally, Denmark has also established a **special court** for dealing with match-fixing, which has its seat at the premises of the Sport Confederation of Denmark.

Furthermore, Denmark has introduced an **anonymous system for reporting suspicious match-fixing activities**, through an online tool which prevents tracking of IP addresses, and allows a communication with the anonymous reporter through a virtual mailbox.

Finally, Denmark has also initiated the establishment of an **integrity officer institution** at the Sport Confederation - with powers for all those national sports associations in Denmark that do not have their own integrity officer.

### France

**France** is another inspirational UEFA country - mostly due to the fact of having altogether **18 integrity officers** active in various sports. French betting regulator, ARJEL, has developed a complex system for **assessing risk of match-fixing prior to matches** themselves, and ARJEL also recommends to introduce an obligation for all national sports associations to **adhere to the Code of Ethics of the International Olympic Committee regulating anti-match-fixing**.<sup>33</sup> Finally, France

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<sup>32</sup>[http://www.dif.dk/da/foreningsliv/stop\\_matchfixing](http://www.dif.dk/da/foreningsliv/stop_matchfixing)

<sup>33</sup> Available at:

[https://stillmed.olympic.org/Documents/Commissions\\_PDFfiles/Ethics/olympic\\_movement\\_code\\_on\\_the\\_prevention\\_of\\_the\\_manipulation\\_of\\_competitions-2015-en.pdf](https://stillmed.olympic.org/Documents/Commissions_PDFfiles/Ethics/olympic_movement_code_on_the_prevention_of_the_manipulation_of_competitions-2015-en.pdf)

pays much attention to the **conflict of interest** - betting operators are forbidden to sponsor leagues and clubs, and even to own them.<sup>34</sup>

### **United Kingdom**

The **United Kingdom** can serve as an example with respect to the obligation to **educate young football players** at the youth academies in respect of betting and anti-match-fixing rules.<sup>35</sup>

### **Belgium**

Finally, **Belgium** is a good example with respect to the use of internal disciplinary sanctions - in case the official from the club's board or management were aware of match-fixing, the **club will automatically be relegated to a lower league**.

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<sup>34</sup> Additionally, similarly as in the UK, in case of failure of a betting operator to report a suspicious activity, **licence for the betting operator can be revoked**. Furthermore, **illegal betting service providers can be blocked** in France as well as in **Romania** where appx. 1000 online betting operators had been already placed within the blacklist published on the website of NOG: <http://www.onjn.gov.ro/>.

<sup>35</sup> Furthermore, betting operators have the obligation to **check whether sportsmen own betting accounts and whether they are betting on their own sport** or not.

## 7. General Recommendations

Based on the identified problematic areas (general problems, investigation problems, issues of a national platform, betting, and international problems) and specific risks falling within the above areas, as well as based on the best practices and the research outcomes in general (questionnaires evaluation, desk research and interviews evaluation), a number of recommendations can be offered here, oscillating around the same problematic areas, as follows:

### General Remarks

Based on our research findings, the most general recommendation within the fight against match-fixing would be a rather obvious advice to **raise the respective funding** - especially for the purposes of employing integrity officers or specialized experts at the level of ministries, law enforcement or betting regulators, to deal with this problem.

From among other general recommendations, which are mostly of a precautionary measures nature, the following can be enumerated:

- **raising the awareness level** through awareness campaigns - especially in relation to major match-fixing scandals
- **special legislation on match-fixing is highly recommended**, or at least the specific crime of “sports corruption” should be introduced in the national Criminal Codes or other pieces of legislation
- **educational activities** at all the possible levels are necessary - from professional to amateur sports, employees of sports clubs or associations, referees, journalists, judges, prosecutors, police officers, ministerial employees, etc.
- **strengthening the cooperation between police and national associations**
- **strengthening the international cooperation** by exchange of best practices
- **strengthening the cooperation with betting operators**, especially within the awareness and educational campaigns - contributing thus at the same time to a positive PR for the operators, and finally
- **the problem of conflict of interest should be paid closer attention to** at both the national and international levels

### Investigation

With respect to match-fixing regulation proper, its investigation and sanctioning, from among the above mentioned practices and problems, it would be especially of use to take over the following practices:

- **to introduce uniform rules against match-fixing** at the national level (be it in a legally binding or non-binding form)

- in case national associations do not have any integrity officer appointed, **at least one integrity officer should be established at the national level for all the associations lacking the officer**
- **to establish a national panel for solving disputes related to match-fixing**, to ensure that the same standards of punishment are applied within all sports in the country
- **there is a need for special police unit in the fight against match-fixing or specialized, well-trained police officers**
- **sanctions for match-fixing should be raised** both in the national legislation as well as within internal disciplinary rules
- **a system of anonymous reporting and protection of whistleblowers should be introduced** at both the national and international levels

### **National Platform**

Our research has consistently shown the importance of national platform for efficient fight against match-fixing. Based on the experience of selected most successful countries and their platforms, following recommendations can be inferred:

- the platform should not take a form of a commission or advisory body, but rather **should have proper legal basis and competences specified by law**
- **the platform should represent a discussion and cooperation forum for police, the prosecution office, ministry of sports, betting operators, betting regulator, and representatives of the national associations** (football, Olympic Committee, etc.)
- **the platform could consist of a number of sub-committees, e.g. for investigation, prevention, regulation, etc.**
- **investigative powers could be entrusted to a subcommittee comprising representative of police, the prosecution office and the respective sports association**
- **the number of members of the platform should not exceed 15-25**
- **platforms should cooperate internationally**, exchange information and best practices - an example is the Copenhagen Group. Exchange of best practices and education is also important between stakeholders on national level (sport federations, police and judicial authorities)
- it is worth to **include players as members of the platform** - due to the possible insider knowledge that the players may possess; however, the players should not be active in the investigation itself

### **Betting**

With regard to the betting regulation, following recommendations can be inferred from the research outcomes and best practices identified:

- **an independent national betting regulator should be established**



- **the object of betting stakes should be specified in national legislation** - the objects of betting stakes should be approved by the event organizer
- regulator should aim at identification of potential risks prior to the match itself, e.g. by **using an information system tracking suspicious betting patterns**
- **illegal betting services should be limited** at the national level as much as possible via the regulation of the online betting market
- **cooperation with the betting providers** holding national license should **include the obligation of betting providers to report any suspicious activities under the sanction of license withdrawal**
- **betting financial transfers should be tracked by police**, since the profit from fixed matches is often used for illegal purposes
- **betting by sportsmen even through any intermediaries should be strictly forbidden and lists of sportsmen should be used to check whether they are betting on the results of competitions or matches from their own sport**

### International Level

Albeit being of a very slight probability, establishment of an international or European **authority entrusted with the fight against match-fixing** might be a good move towards tackling the issue of match-fixing uniformly at the international level. Such an authority should primarily support and promote cross-border cooperation and exchange of information in order to combat the match-fixing phenomenon. First steps towards this could be performed at the level of the EU - first moves taking at least the form of **European Parliament policy papers**. The EU Member States and the governments of UEFA member associations should also do their best to sign and ratify the **Macolin Convention** against match-fixing.

It could also be worth to introduce a **database of sanctions and criminals** involved in match-fixing, be it either governmental (police) database, or a UEFA-wide database.

## 8. Recommendations for the UEFA

Previously summarized recommendations were of a general nature and often lie beyond the scope of activities and competences of UEFA. Hereinafter we shall therefore **summarize and emphasize those recommendations that may be implemented by UEFA itself, or by its member associations upon UEFA's promotion and support.**

The UEFA could:

- **initiate and recommend its member associations to exert pressure on their national governments to establish a national platform**, involving representatives from football; **Best practices with respect to composition and competences of the platform are summarized in the report** - mostly in the form of national platform being **attached to the national betting regulator**, and consisting of **representatives of police, prosecution, relevant ministries, betting regulator, betting service providers, sports associations, and possibly even sportspeople's representatives**,
- **promote the idea of an umbrella organization for the fight against sports corruption (match-fixing) throughout all sports at the international (or European) level** - albeit this is outside the scope of competences of UEFA and the final outcome depends on different actors than UEFA,
- **promote the idea of a more detailed legally binding regulation of sports corruption at the international, European and specifically EU level** - albeit this is outside the scope of competences of UEFA and the final outcome depends on actors different from the UEFA; still, a sort of cooperation e.g. **with the European Parliament in raising the awareness level of the problem in the EU could be worth a try in this respect**,
- **introduce uniform rules concerning match-fixing and its investigation at the level of disciplinary rules** among the UEFA member associations. Thereby, **strict sanctioning principles as well as relatively broad competences for investigation bodies (disciplinary committees) should be guaranteed** (e.g. **suspension competences, search and seizure competences**), as proposed mostly by the experts from the UK (see the report for more details - **suspicious players should get suspended, failure to report an attempt for match-fixing should also be an offence, club itself could be punished by relegation, etc.**),
- **redesign the UEFA integrity network** and support and promote exchange of information among the national associations, including sharing the best practices. UEFA should especially make sure that there are **full-time employed integrity officers within the national associations** and that these **attend regular educational campaigns organized by UEFA**, and provide monthly reports on the situation in their country, as well as **promote national educational campaigns themselves**,

- **improve a system for anonymous reporting** of match-fixing (i.e. whistleblower protection as introduced e.g. in Denmark, where the **IP address cannot be tracked and it is possible to communicate with the informers through a virtual mailbox** without knowing their identity),
- **propose a uniform internal regulation of personal data processing** with respect to match-fixing investigations,
- **insist on more detailed regulation of anti-match-fixing in the players' contracts**<sup>36</sup> (explicit prohibition to bet on one's own victory),
- insist on a **regular payment of salaries** by the clubs, so as to limit the need for earning their money through match-fixing activities; and introduce ways to **identify the most vulnerable players**, based on their known problems (financial, gambling addiction),
- **introduce rules to prevent any conflict of interest with respect to sponsorship** (sponsorship by betting companies),
- **introduce strict and transparent rules for intermediaries and referees** - in the case of the latter especially with respect to **selection and promotion of referees**,
- **introduce explicit regulation of competences of dispute resolution chambers with respect to match-fixing** (e.g. within an appellate procedure).

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<sup>36</sup>Cf. cirkulaere nr 89\_bilag\_standardspillerkontrakt\_eng - part 2 section 4.

## Attachment No. 1

### Integrity Officers Questionnaire

1. Which country (NA) do you represent?
2. Did your country sign the Council of Europe Convention on the Manipulation of Sports Competitions ("Convention")?
3. Have any changes to your national legislation or situation in match-fixing in general taken place in your country since the 2012 KEA report? Please see your country's profile (if applicable) under:  
[http://ec.europa.eu/sport/library/studies/study-sports-fraud-final-version\\_en.pdf](http://ec.europa.eu/sport/library/studies/study-sports-fraud-final-version_en.pdf)
4. In case your country was not included in the KEA report, please indicate existing national legislation on match-fixing/corruption in sports. Please, specify briefly the legislation indicated above.
5. Please, provide a link to the text of the respective law on match-fixing, relevant provisions of the law or a case law, if applicable, including a link to the relevant decisions or to further information on the cases (disregarding the language).
6. Which internal regulations of your NA take the match-fixing problem into account?
7. How much do these match-fixing regulations correspond with the UEFA Resolution: European football united for the integrity of the game? You can find it at:  
[http://www.uefa.org/MultimediaFiles/Download/uefaorg/MatchFixPrev/02/07/89/27/2078927\\_DOWNLOAD.pdf](http://www.uefa.org/MultimediaFiles/Download/uefaorg/MatchFixPrev/02/07/89/27/2078927_DOWNLOAD.pdf)
8. Could you define and describe examples, when the regulations of your NA go beyond the minimal standards of the UEFA Resolution? Please, provide a link to the text of the respective regulations of your NA (e.g. disciplinary code).
9. Does the match-fixing problem in your country have a growing trend or is there a steady situation?
10. Do you think that awareness campaigns or codes of conduct help in fighting the match-fixing?

- 11.** How would you evaluate the cooperation with law enforcement authorities in the investigation of match-fixing in your country?
- 12.** Has the cooperation with the stakeholders (law enforcement, betting operators, etc.) improved lately due to the national legislation changes, Convention or due to any other reasons? If your answer to the previous question was "yes", please, specify the reasons:
- 13.** Can you assess the potential influence of the Convention on the fight against match-fixing in your country? If your country already signed the Convention, please, assess its actual influence on the fight against match fixing in your country.
- 14.** Did your NA or your country (government) take any measures with respect to the Convention? If yes, please specify...
- 15.** Where do you see (if applicable) any strengths and weaknesses of the Convention?
- 16.** From your point of view as an Integrity Officer, would you prefer a more detailed legally binding international regulation on match-fixing, going beyond the Convention?
- 17.** How many suspected matches (cases for potential investigation) have been reported in your country from 1 January 2015 to 31 July 2016?
- 18.** What types of evidence are considered relevant enough to start criminal investigations by law enforcement authorities in your country?
- 19.** What types of evidence are considered relevant enough to start disciplinary proceedings and take measures upon the match-fixing suspicion under your NA?
- 20.** Can criminal sanctions for match-fixing be imposed on legal entities (clubs, etc.) in your country?
- 21.** Is betting on sports matches supervised by any specific institutions in your country?
- 22.** What special regulation of betting (including the online betting) is applied by the legislation listed in the answer to the previous question?

- 23.** Which competitions, matches or just types of stakes are prohibited to be an object of betting or which would you propose to be forbidden from placing bets on?
- 24.** How do you cooperate with the betting industry?
- 25.** What do you see as a biggest challenge/problem in the fight against match-fixing in general? What are your recommendations for the near future?

## **Attachment No. 2**

### **Directed Interviews Questions**

#### **General**

1. What is the awareness level in your country about match-fixing?
2. What is your organisation doing in the field of fight against match- fixing?
3. Does the match-fixing problem in your country have a growing trend or a steady situation?
4. Do any sport federations in your country have someone like integrity officer in football? (someone who deals with corruption in sport.)
5. Does match-fixing have influence on amateur football competitions?
6. What is your experience with educating players on match-fixing? What is your experience (if applicable) with the use of codes of conduct, or agreements with the betting industry?
7. What specific measures has your national association or your government taken with respect to match-fixing (awareness campaigns, policy documents, changes to internal rules...)
8. Do you think that establishment of international organisation against match-fixing will help (means an organisation e.g. WADA in doping)?
9. Do you think that adopting of specific law against match-fixing on European level obliged to all European states will help?
10. What do you think should UEFA and international organisations do in matter of legislation or in investigation to improve/help the fight against match-fixing?
11. What kinds of problems do you see in the legislation on the European level or state level?
12. What do you see as a biggest challenge/problem in the fight against match-fixing in general? What are your recommendations for the near future?

## Betting

1. Some countries oblige betting operators to report suspicious betting patterns. e.g. as part of the licence (The Netherlands, Belgium, UK, Switzerland). How is it in your country?
2. Can be trust or control based?
3. How can we check if betting operators report? How can we set standards for their monitoring systems?
4. Is there any special regulation on online betting in your country?
5. Does your country experience a problem with online betting?
6. What special regulation of betting (including the online betting) is applied?
  - closure or direct and indirect restriction of access to illegal sports betting operators
  - blocking of financial flows between illegal sports betting operators and consumers
  - prohibition of betting on youth sports competitions (e.g. players under the age of 18)
  - restriction or regulation of betting opportunities/stakes (yellow cards, fouls, corners, coin toss, etc.)
7. Which competitions, matches or just types of stakes are prohibited to be an object of betting, and which would you propose to be forbidden from placing bets on (such as first foul or yellow card)?
  - lower leagues (amateur football)
  - match details purely based on the factor of luck (coin toss, choice of the side)
  - match details which are easily to be manipulated (corner, throw in)
  - match details based on negative activity (foul, yellow card, penalty)
  - youth competitions (under 18 years old)
8. What do you think about risk assessment prior to and during games and tournaments (access to betting transactions, control at sports competitions / matches, analytical and investigative powers in BRA / national platform)?
9. Do you punish players and staff for betting? If yes, how do you do it?



## **National Platform**

1. Who should be (or is) a member of a national platform in the fight against match-fixing? Should there also be some player as a member?
2. Which organisation or body (e.g. betting regulator, ministry etc.) should host the platform? Advantages of different models?
3. What is a good practice in terms of leading a National Platform? Should it have a strategic, advisory or operational status (participating on investigation) or a mix of all?
4. Mandate and competencies of platform? Which are and which should be?
5. How should the platform handle information? Be able to analyse and investigate information or just share information?
6. Should the platforms have sub-groups? Do we need additional forums?
7. The legal challenge is mainly sharing of personal information with sports governing bodies, betting operators and the private organisations. Is it or also in your country?
8. How did you tackle the issue of human and financial resources? Are there any doubts when you think of setting up a National Platform?
9. How should the National Platforms cooperate? Or should they work together? What do you think about Copenhagen group?
10. What kinds of problems do you see in the operation of the platform? Can you name strong or weak points of having established a platform?

## **Investigation**

1. How would you evaluate the cooperation with law enforcement authorities in the investigation of match-fixing in your country?
2. Has cooperation with the stakeholders, improved lately due to the national legislation changes, Match-Fixing Convention or due to any other reasons?
3. Do you cooperate crossborder with other national associations or foreign police officers? Have you come across any obstacles in the cooperation?

4. What is the relationship between criminal and disciplinary proceedings? Which one takes priority? Can criminal proceedings be terminated provided a disciplinary sanction is considered satisfactory?
5. How did you deal with cases involving match-fixing? What was the key evidence? What kind of problems you had to deal with? Can you name risks or weak points?
6. What types and forms of evidence are being collected and used in the investigations?
  - UEFA BFDS report
  - report from any other betting monitoring system
  - whistleblower's testimony
  - INTERPOL or EUROPOL report
  - video analysis of a suspected match
  - anonymous complaint
7. Can criminal sanctions for match-fixing be imposed on legal entities (clubs, etc.)?
8. Do you think that criminal sanctions in your country are enough or do you think there is a need for some changes?
9. What do you think about amount of reports you get from all kind of sources including whistleblowers? Are you satisfied?
10. What do you do for whistleblower protection? Do you think that anyone can feel safe when he is reporting?