

PROTECTED REPORTING PRACTICES

2020 DATA SETTING AND ANALYSIS REPORT



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TRAINING ON PROTECTED REPORTING SYSTEMS FOR PROFESSIONAL AND GRASSROOTS SPORTS



Work Package 3 - Intellectual Output 1

Report: Data setting and analysis on protected reporting practices

Data setting elaboration, functional to introduce in a structured way
the use of protected reporting systems
in the anti-match fixing policies
and actions of sport bodies and institutions



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Abbreviations

- ADR - Alternative Dispute Resolution
- AFC - Asian Football Confederation
- AFE - Spanish Footballers Association
- AMATT - Anti-Match-Fixing Top Training
- ATP - Association of Tennis Professionals
- BZgA - Federal Centre for Health Education
- CC - Coaches Committee
- CNMC - National Commission of Markets and Competition
- CNMV - National Securities Market Commission DCMS - Department for Culture, Media and Sport
- CONI - Italian Olympic Committee
- CONSOB - National Commission for Companies and the Stock Exchange
- COP - Portugal Olympic Committee
- COVISOC - Supervisory Commission on Professional Football Clubs
- CRO - Conversion Rate Optimization
- CSD - National Sports Council
- DFB - German Football Federation
- DFL - Bundesliga German Football League Association
- EC - European Commission
- EPFL - European Professional Football Leagues
- EU - European Union
- EWS - Early Warning System
- FAM - Football Association of Malaysia
- FCF - Catalonian Football Federation
- FIFA - Fédération Internationale de Football Association
- FIFPro - Fédération Internationale des Associations de Footballeurs Professionnels
- FIGC - Italian Football Federation
- FPF - Portuguese Football Federation
- GASS - Gioco Anomalo Scommesse Sportive
- GISS - Sport Betting Investigative Unit
- IAAF - International Association of Athletics Federations
- IBIS - Integrity Betting Intelligence System
- ICES - Centre for Ethics in Sports
- IFC - Independent Football Commission

IFO - Independent Football Ombudsman
IOC - International Olympic Committee
JPY - Jalkapallon Pelaajayhdistys
LaLiga - Professional Football League
Ligaverband - German Football League
LP - Portuguese League
MSL - Malaysia Super League
PFA Scotland - Professional Footballers' Association Scotland
PTIO - Professional Tennis Integrity Officer
RBFA - Royal Belgian Football Association
RC - Referees Committee
RFAF - Royal Andalusian Football Federation
RFEF - Royal Spanish Football Federation
ROS - Special Operational Unit
SBIF - Sports Betting Integrity Forum
SBIU - Sports Betting Intelligence Unit
SCICO - Central Organized Crime Investigating Office
SCO - Central Operational Office
SEPBLAC - Executive Service of the Commission for the Prevention of Money Laundering and Monetary Offenses
SFA - Scottish Football Association
SJPF - Professional Football Players Union
SPFL - Scottish Professional Football League
TA - Tax Agency
TACP - Tennis Anti-Corruption Program
TIPP - Tennis Integrity Protection Program
TIU - Tennis Integrity Unit
T-PREG - Training on Protected Reporting Systems for Professional and Grassroots Sports
UEFA - Union of European Football Associations
UISS - Sport Betting Information Unit
UK - United Kingdom
UNIRE - National Union of Horse Breeds
UNODC - United Nations Office on Drugs and Crime
WADA - World Anti-Doping Agency
WP - Work Package

WTA - Women's Tennis Association

1. Work Package 3 in T-PREG: Data-Setting and analysis on protected reporting practices for a structured use of protected reporting systems

1.1 Work Package 3 Context

Reliable research shows there is a growing awareness that protected reporting systems are very relevant in disrupting the *omertà* and the conspiracy of silence which is the main obstacle to combatting the phenomenon of match-fixing. There is also growing evidence that the cost-benefit ratio of these tools is very convenient, but the diffusion and use of these tools is still very limited in Europe despite the growing recommendation to protect potential whistle-blowers, in coherence with the ongoing European policies in the field of sport.

In particular, article 7.2.e of the Magglingen/Macolin Convention, for instance, recommends the adoption and implementation of “appropriate measures in order to ensure” (...) effective mechanisms to facilitate the disclosure of any information concerning potential or actual cases of manipulation of sports competitions, including adequate protection for whistle blowers.

The use of these systems also matches what the European Commission (EC) acknowledged in many communications (COM (2011) 128 final; COM/2012/0596 final), recommendations (CM/Rec(2011)10), and the Forum held in Brussels on 2013. It is also functional to contribute to the implementation of European Union (EU) law focused knowledge on sport corruption and national criminal law provisions applied to match-fixing (COM/2012/0604 final; a Study of Criminal law Provisions in the Members States; 2012).

More specifically, the use of protected reporting systems is very coherent to the goals of the Nicosia Declaration (2012), because:

- It involves Education and Prevention Initiatives, within a wide cooperation environment, for important actors' groups in the field of professional and grassroot sports;
- It fosters cooperation among most interested parties, in the perspective of informing and including public authorities, law enforcement agencies, sport stakeholders and betting operators;
- It promotes consistent coordination at European level.

Interest in this system has been shown by the Olympic movement, and even if the International Olympic Committee (IOC) has initiated a well-intentioned policy to combat match-fixing, the world of sports is not in a condition, generally speaking, to cope with this problem too effectively and they are systematically calling for help from the States.

The Italian Government Office for Sport has conceived and designed an advanced platform for protected reporting, and it provides a very solid experimentation base.

Moreover, there are some European practices which can become reference models, both for their successes and their failures. In particular, two good practices have been experienced in Austria and Denmark (through the advisory by PlayFairCode Austria and Anti Doping Denmark).

These experiences have proven that this typology of instruments is very functional to facilitate a strong private-public cooperation and an effective interaction/synergy among the different actors and stakeholders involved in the anti-match-fixing process.

The Work Package 3 (WP3) activities are a sort of a follow-up of the EU financed projects “Staying on the side: Stop Match-fixing”, “AntiMatch-Fixing Formula: Understanding, Share, Methodize, Replicate”, and “Anti Match-Fixing Top Training”, all financed with European public funds, too.

So, in relation to the previous described information, this WP is a very relevant added value of the entire Training on Protected Reporting Systems for Professional and Grassroots Sports (T-PREG) project at EU level because the data-setting process for the training phase and the tailoring of the training design can be achieved only through a strong transnational cooperation based on local entities with a specific know-how and reputation. Only in this way is it possible to generate a shared training model and feed properly a shared tool for all actors at EU level. It would simply be impossible to generate such results operating solely in a single country.

1.2 Aim

The key objective/goal of the T-PREG project is to introduce in a structured way the use of protected reporting systems in the anti-match-fixing policies and actions of sport bodies and institutions related to sport practices, through a proper, competent and informed approach.

In the framework of the ongoing private and public policies and actions against match-fixing, the aim of this WP is to ease and strengthen significantly the effectiveness of these systems through a strong focus on a data-set that permits a training/information sharing related to a proper “competent and tailored” implementation/use of the different possible models of protected reporting systems based on relevant data that allows for a specific knowledge and understanding of the match-fixing phenomenon.

This is because, from the previous projects on match-fixing¹, it emerged that:

- Training activities which are not based on specific data about the phenomenon and not accurately tailored to targets are highly ineffective and have a serious risk of very low efficiency in the medium and long term;

¹ EU financed projects taken into consideration are: “Staying on the side: Stop Match-fixing”; “AntiMatch-Fixing Formula: Understanding, Share, Methodize, Replicate”; “Anti Match-Fixing Top Training”.

- There is a high potential of Ombudsmen roles and of whistleblowing procedures, which cannot be underutilized if there is a serious goal of effectiveness;
- Generic awareness levels are already quite high among players and sport organization, while specific and technical knowledge on protected reporting systems is very low.

So, the final object of WP3 is the creation of the pre-conditions (specific data) for effective training actions: for that purpose, the training activity in T-PREG has been conceived structurally linked to this data-setting phase. It does avoid the high-risk of generic training or activities based on generic or very limited/not reliable data.

1.3 Actions

The first innovative action of WP3 has been the construction of a very strictly coordinated European work team all over state and disciplinary boundaries: the effort of the WP is to truly establish a transdisciplinary and trans-national working team.

This team has been composed by:

- Catholic University (Italy) has specialized on the topic “Sports Integrity” in a long-term perspective;
- ISCTE-IUL (Portugal) is a research university with a multi-disciplinary and inter-disciplinary approach which has developed research in global security, the fight against corruption and integrity in sport. It was involved in different European projects addressing these issues;
- KU Leuven (Belgium) has an historical tradition in criminology. It is the most recent institutional incarnation of the criminological tradition in Leuven that started with the establishment of the "School for Criminology" in 1929. LINC intends to continue the Leuven tradition of combining solid research with a deep commitment to society;
- TI-Slovenia has as its main mission to fight corruption. In this framework, the issue of corruption in sports is recognized as very relevant and deserves a high degree of attention;
- UAM (Spain) has a long tradition in studies on corruption, money laundering and ethics.

In order to reach the goals declared in the previous paragraph, WP3 implemented the following actions:

1. Data-set creation through a very targeted analysis to gather/organize specific data on the practices of protected reporting systems;

2. Anchorage of the data-set to the pre-established knowledge of the phenomenon.

The first action has been implemented in particular by ISCTE-IUL, KU Leuven, TI-Slovenia and UAM and had been inspired, methodologically speaking, by three previous EU founded researches² in which Catholic University and ISCTE have collected important data on the match-fixing phenomenon and on protected reporting systems.

The second one has been implemented by Catholic University, which, thanks to its previous experience in the field of match-fixing scientific studies and its participation in all the cited European projects on sports integrity, had the right competency to anchor in a comparable way the new data with the previous collected data and with the existing literature.

The action of data-collection had been structured in five phases: preparation; implementation; monitoring; evaluation; dissemination. A more articulated description can be found in the table below (Table 1).

Table 1 - WP3 data collection process

WP3 Data-Collection Process	
1 - Preparation:	
a)	Collection of information functional to construct the data collection
b)	Construction of the target groups
2 - Implementation:	
a)	Construction of quantitative and qualitative survey instruments
b)	Collection of comparable quantitative data
c)	Collection of comparable qualitative data
d)	Elaboration of data
3 - Monitoring	
4 - Evaluation	
5 - Dissemination of data to stakeholders and the public through the website and tailored press office activities.	

1.4 Report construction criterion

The WP3 –IO 1 report of T-PREG has been constructed to return and bring out the work of all the partners. For this reason, all the national reports have been reported in chapter 4.

² "Staying on the side: Stop Match-fixing"; "AntiMatch-Fixing Formula: Understanding, Share, Methodize, Replicate"; and "Anti-Match Fixing Top Training".

The other chapter has been articulated through two different criteria:

1. Enhancing patterns that can be found in all the reports:
 - a. Chapter 2: Desk analysis of protected reporting mechanism in the sports sector;
 - b. Chapter 3: Desk Analysis on legal framework and ongoing reporting system in T-PREG partners;
 - c. Chapter 5: Quantitative-qualitative insights on the use and perception of match-fixing and protected reporting systems;
 - d. Chapter 6: General Key Trends and orientative considerations.
2. Enhancing the points of the different partner's reports that have an international relevance but also that are not common to all other reports and that could act as best practices at European level:
 - a. Focus: an organizational best practice. The Italian public-private reporting system (in chapter 3);
 - b. Focus: studying visualization, access and information of reporting systems (in chapter 3)
 - c. The international part of the Italian research on the analysis of protected reporting mechanism in the sport sector (in chapter 3)
 - d. Boxes on national peculiarities in chapter 5.

1.5 Methodology

The methodology proposed had been based and articulated on a very solid needs analysis allowed by the previous projects "Staying on Side: How to Stop Match-Fixing"; AntiMatch-Fixing Formula", and "Anti Match-Fixing Top Training" that indicates the huge importance of three factors: the necessity to base training on solid data and specific tailoring to different targets; the necessity to address training to sports organizations top decision-makers; the importance to start including grassroots sports.

So, the methodology instruments had been constructed to:

- Better understanding of the ongoing practices and the underlying dynamics of the protected reporting system before the design and conception of the training process;
- Developing an approach oriented towards a strong tailoring of the training models in these fields.

The target group of the WP3 coincides with the target of the entire project:

- top decision makers in primary sports bodies (National Olympic Committee, National Federations, Top Sport Clubs);
- grassroot sports club managers where the cultivation of future behaviours/misbehaviours takes place and where match-fixing practices are unfortunately emerging at youth level.

Target groups identified had been very significantly committed to receive the action since:

- Sports organization top decision makers are in strong need of data and know-how on how to tackle a problem they have not approached in the past, so they find themselves in need of knowing and reflecting on the analyzed phenomena;
- Grassroots club managers find themselves in a growing need for having access to data and specific knowledge about the phenomena.

The research activities had been structured using three methodological instruments:

1. Desk analysis;
2. Quantitative exploratory survey;
3. Qualitative interviews.

The Desk analysis had been used to better understand protected reporting mechanisms in the sports sector and it particularly developed in two research areas:

1. Selected analysis of protected reporting mechanism in the sports sector
2. Desk Research on legal framework and ongoing reporting system in TPREG partners countries

The quantitative exploratory survey is related to a better understanding of the presence of whistleblowing in match-fixing cases, to the awareness of existing protected reporting system and to the main reason that can motivate to report/not report a match-fixing action to a whistleblower (see Table 2).

The qualitative exploratory survey is related to a better understanding on what do the targets think about whistleblowing, the behavioral and normative beliefs, the factors, conditions or situations that would

enable or hinder from engaging in whistleblowing and the reasons for/against whistleblowing (see Table 3).

These two qualitative and quantitative surveys had been conceived as complementary in order to permit the collection of common insights on the use and perception of match-fixing and protected reporting systems.

During the data collection phase there have been some minor changes to the instruments because of some peculiarities of the country in which the instrument was applied. In these cases, however, there have not been changes of particular relevance for the data analysis. These changes, then, aren't substantial.

The research data collected had been analyzed according to the following lines of reflection:

1. Desk analysis of protected reporting mechanism in the sports sector;
2. Desk analysis on legal framework and ongoing reporting system in TPREG partner countries;
3. Quantitative-qualitative insights on the use and perception of match-fixing and protected reporting systems.

In particular, the quantitative-qualitative collected data has been analyzed through a qualitative in-depth approach aimed at highlighting themes and trends common to the states involved in the project on the use and perception of match-fixing and protected reporting systems, and in particular:

- Factors that lead to a fix;
- The importance of the presence of ethics in sports;
- The code of silence;
- To fix or not to fix: consequences and the sense of impunity;
- Solutions perceived;
- Protected reporting systems are needed;
- Added values and risks of a protected reporting system;
- Factors that motivate and prevent from reporting match-fixing using a reporting system.

Table 2 - Quantitative exploratory survey

T-PREG
Training on Protected Reporting for Professional and Grassroots Sport

EXPLORATORY SURVEY

Sport:

Role/s in sport:

- ❖ Player
- ❖ Referee
- ❖ Coach
- ❖ Manager/Staff

Age

Gender

- ❖ Male
- ❖ Female

Marital status?

- ❖ Single
- ❖ Live-in partner
- ❖ Married
- ❖ Divorced
- ❖ Widowed

Do you have kids?

- ❖ Yes
- ❖ No

Nationality

Educational qualification

- ❖ Compulsory school
- ❖ High School Degree
- ❖ Bachelor's Degree
- ❖ Master's Degree
- ❖ Post-graduate degree
- ❖ Classes attended for personal choice (specify).....

Do you have a manager/sport agent?

- Yes
- No

How acceptable do you think is whistleblowing match-fixing cases or proposal among your colleagues/fellow athletes in your sport?

- a) Totally acceptable
- b) Acceptable
- c) Little acceptable
- d) Not acceptable at all

In the current situation, to what extent do you agree with the following statements

(1=nothing agree, 5 = totally agree)?

A sports actor (athlete, coach, manager, referee or judge) of my modality will always denounce an attempt to manipulate a result

1 2 3 4 5

Reporting manipulations of results in “member state name” is dangerous and can harm the sports career of those who do it:

1 2 3 4 5

Athletes / coaches / officials / referees or judges have at their disposal conditions of protection, so that they do not suffer retaliation in case of reporting match-fixing

1 2 3 4 5

In order to successfully combat match-fixing in “member state name” it is necessary to create an affective and secure protected reporting system

1 2 3 4 5

Are you aware of existing protected reporting system to report safely and effectively if necessary?

Yes

No

In your opinion, if an actor of your sport fixes a match, then the chances of being discovered are:

- a) High
- b) Medium
- c) Low
- d) Very low

In your opinion, if a match-fixing is discovered in your sport, the possibility of the participants being punished is:

- a) High
- b) Medium
- c) Low
- d) Very low

What are the five most important reasons that would motivate you to engage in whistleblowing to report a harmful irregularity in your sport? (This question can be open answer or we can suggest 10 hypothesis and they chose)

What are the five most important reasons that would prevent you from engaging in whistleblowing to report a harmful irregularity in your sport?

Who do you think should manage an integrated protected reporting platform so that it is effective and secure?

The Olympic Committee

The Portuguese Institute of Sports and Youth

The National Platform

The betting regulator

Sports Federations

An independent entity of civil society

The police

The Justice

The Union

Table 3 - Qualitative survey. Interview guide for interviewers and co-researchers

QUALITATIVE INTERVIEW: GUIDE FOR INTERVIEWERS AND CO-RESEARCHER					
Question theme	Grand tour questions	Behavioural beliefs	Normative beliefs	Controllability beliefs	Reasons for/against whistleblowing
Main questions	What do you think about whistleblowing?	Why do you think some people engage in whistleblowing? How would you feel if you became aware of a harmful irregularity in sport (e.g., doping, match fixing) and you reported it through a whistleblowing mechanism?	Who are the individuals or groups of people that would be more likely to engage in whistleblowing in your sport? How acceptable do you think is whistleblowing among your colleagues/fellow athletes in your sport?	What factors, conditions or situations would <u>enable</u> or <u>hinder</u> <u>you</u> from engaging in whistleblowing?	What are the five most important reasons that <u>would motivate you</u> to engage in whistleblowing to report a harmful irregularity in your sport? What are the five most important reasons that <u>would prevent you</u> from engaging in whistleblowing to report a harmful irregularity in your sport?
Prompts (if not addressed already in the answers provided by the participants)	Are you aware of ways and mechanisms to safely and effectively engage in whistleblowing if you needed to?	What do you think are the benefits of whistleblowing for <u>you personally</u> and for <u>your sport</u> ? What do you think are the risks of whistleblowing for <u>you personally</u> and for <u>your sport</u> ?	What do you think that most people of your age, gender and profession (or level - if athletes are interviewed) would do if they became aware of a harmful irregularity in sport, such as doping and match fixing?	What issues come to mind when you think about your ability (i.e., how easy or difficult it would be for you) to engage in whistleblowing?	

2. Desk analysis of protected reporting mechanism in the sport sector

The desk analysis highlights the increasingly important role of the reporting system as a method of prevention.

With particular reference to the best practices in the field of whistleblowing undertaken by sports organizations at an international level, the desk analysis highlights the strong awareness of the need for a greater commitment primarily from the world of sport, to guarantee the protection of sports integrity and, specifically, the contrast to match-fixing.

There are some interesting case-studies that have been selected because they are at the forefront, as the case of Austria where the current system is the result of a public-private collaboration for the protection of sports integrity.

Also significant is the case of the system chosen by the football federation in Finland, a pioneer in setting up an anonymous protected report via mobile application to facilitate a widespread use of match-fixing reports. More traditional instruments, in fact, have a lower propensity to high report results.

Historically, the use of the whistleblowing tool was born in the Anglo-Saxon countries to report certain types of risk or cases of corruption. In 2009³, Transparency International Italy highlighted the effectiveness of this tool, "useful not only to prevent corruption in institutions or organizations, but also to involve citizens and civil society in the control and contrast activity of illegality, making them responsible and requiring their active participation to improve the company".

This conclusion must be considered even more valid in the world of sport in which, in the absence of adequate instruments, athletes, technicians, manager etc. choose to remain silent even for fear of possible retaliation, rather than referring to the disciplinary body or the judiciary system.

What this study allows above all to highlight is the importance and the increasing use of whistleblowing systems in sport in general and in the fight against match-fixing. The need to break the "silence" of the world of sport, which has in some cases been "hostile" to any external survey, is commonly known. As can be seen from a lot of the cases presented in the literature, it is a matter, first of all, of promoting a culture that encourages people who are suspected of reporting them as soon as possible without fear of intimidation, repercussions on their pay or recriminations from the sport itself.

2.1 The importance of whistleblowing for match-fixing enforcement

The objectives of the Council of Europe Convention on the handling of sports competitions are the prevention of the manipulation of sporting competitions, the identification and contrast of match-fixing.

It is aimed at all potential subjects that operate, for various reasons, in the fight against match-fixing,

³ https://www.transparency.it/wp-content/uploads/2013/12/Policy_Paper_01_Segnalanti.pdf.

therefore public authorities, sports organizations and betting operators. In particular, the art.º 7 of the Convention urges sports organizations and competition organizers to adopt and implement guarantee measures and principles of good governance, as well as stricter rules and more severe disciplinary sanctions for violation cases.

Among these measures, explicit reference has been made to the opportunity to activate and strengthen protected reporting systems defined as "*effective mechanisms to facilitate the disclosure of any information relating to actual or potential cases of manipulation of sports competitions, including adequate protection for those that we denounce irregularities*"⁴

The Transparency International report on corruption in sport⁵ in general includes some recommendations on the match-fixing issue, urging Member States to ratify the aforementioned Council of Europe Convention, betting operators to report any held betting activity suspect and sports organizations to adopt anonymous, confidential and secure reporting systems.

The present desk analysis focuses on the use of whistleblowing systems for reporting suspected cases of manipulation of the sporting event to protect its image and integrity⁶ and set up with the primary objective of preventing the phenomenon of match-fixing and the completion of the crime of sporting fraud, where it exists, as the reporting of a suspected case of match-fixing by a sportsman, his coach or agent, his teammate or any other person associated with them represents one of the ways to actively prevent the phenomenon.

2.2 The various existing systems of whistleblowing

The intent of this document is specifically to highlight the best practices implemented in the European and international overview with regard to protected anonymous reporting systems to contrast the match-fixing phenomenon.

In general, a protected reporting system is considered an integral part of a monitoring, prevention and intelligence system, to identify cases of match fixing. From a subjective point of view, the analysis carried out makes it possible to see how the choice and implementation of these systems was carried out mainly by sports organizations with the aim of building and spreading a culture of sports integrity and clarifying their position. The proactivity of sports organizations in the adoption of match-fixing prevention tools is found both in the drafting of codes of conduct to establish a betting ban and the obligation to report and in the

⁴ Art.7 Comma 2 lettera C of the Convention

⁵ Global Corruption Report 2016: http://www.transparency.org/news/feature/sport_integrity.

⁶ 2015 Declaration of the DG World Anti-Doping Agency, David Howman: "*The intrinsic values of sport, often referred to as "the spirit of sport" is the celebration of the human spirit, body and mind, and is characterized by values such as ethics, honesty, respect for rules, self-respect and respect for others, fair play and healthy competition. If sport is void of these values (and others) it might be argued it is no longer sport*".

implementation of protected reporting systems.

There are few "virtuous" systems where the Government, as in the case of Austria or public authorities, as in the case of the United Kingdom (UK), intervene in the implementation of whistle-blowing systems. Evidently, the intervention strategies detected derive from a precise national strategy in which the integrity of the sport turns out to be a public interest.

Still under the subjective profile of the actors involved, the cases of Austria and the UK are still significant for the involvement of public actors and the sports world. Betting operators are also involved: they proactively intervene in the reporting of anomalous betting flows and betting patterns. In the cases examined during the desk analysis, the direct involvement of the betting operators is not frequent and is left to a voluntary choice. Yet the involvement of betting operators alongside sports organizations seems appropriate and not only in terms of sport financing, as suggested from EC in its White Paper on Sport in 2007 (COM(2007) 391 final).

Prevention actions must be coordinated between public authorities, sports organizations and betting operators. This concern both the application of the aforementioned codes of conduct, often under the supervision of an integrity officer (integrity officer) and the provision of reporting systems protected with clear guidelines about their use. The choice of a public-private collaboration that emerges in some case studies in this work undoubtedly anticipates the implementation of the auspices of the Council of Europe Convention. It is also noted that most pro-active sports organizations and federations, both nationally and, in the case of Germany, internationally, are mainly active in the discipline of professional sport, and in particular in football.

In addition to the examination of case studies, widely presented in the Italian report, it is worth mentioning as:

- In 2011, the Fédération Internationale de Football Association (FIFA), the body that regulates football worldwide, has signed an agreement with INTERPOL to develop an adequate awareness of match-fixing risks;
- In 2012 the Fédération Internationale des Associations de Footballeurs Professionnels (FIFPro), the players' union, published a research on the causes of match-fixing in Eastern Europe, the Black Book⁷ which attests to the vulnerability of footballers and managers athletes when clubs do not pay salaries;

⁷ <https://www.fifpro.org/images/documents-pdf/BLACK-BOOK.pdf>.

Table 4 - An orientative global view on existing systems of whistleblowing – Institutions

Institution	Modality	Name	Whistler	Report managed by	Issue	Anonymity	Sport
IOC	Multithematic (connect directly to the other platform in specific sport)	Integrity and compliance hotline	All	IOC Integrity Betting Intelligence System (IBIS)	All forms of corruption in general	Yes	All
FIFA	Call center and e-mail		Sport actors only	Police (INTERPOL)	Match-fixing	Yes	Football
UEFA	Call center, app and online platform	Integrityline	All	Not specified	Match-fixing	Yes	Football
TIU	E-mail		Athletes	Police (EUROPOL)	Match-fixing	Yes	Tennis
FIFPRO	Mobile app	Red Button	Players	Depends on the Country	Match-fixing	Yes	Football

- Two years later, the Union of European Football Associations (UEFA), the European football regulator, and the European Club Association and the European Professional Football Leagues (EPFL) drafted a new code of conduct⁸, specifying how their associates should take measures to combat match fixing.

And yet, from the chronicle of events, the match-fixing phenomenon has never been limited to just football, contaminating and damaging the image of sport in general, whatever the sport discipline.

From an objective point of view, it is interesting to note first of all the presence of systems specifically dedicated to contrasting match fixing and sports fraud, as in the case of Finland. In this case there is the presence of multi-thematic protected reporting systems that include, among other topics, even the reports of possible manipulation of the games. It can be found in the case of Australia, FIFA and IOC too.

The different reporting methods that can be implemented through:

- individual meetings in physical points (outlets);
- by telephone to the appropriate toll-free numbers;
- compilation via web or email;
- dedicated mobile application;
- Ombudsman.

Regarding the figure of the Ombudsman, also of Anglo-Saxon derivation, he must be an expert and independent entity⁹.

It generally falls under the Alternative Dispute Resolution (ADR) tools complementary to the judicial alternative with a procedure that is certainly leaner and faster, and is frequently used in contractual relationships in which there is a weaker counterpart (typically B2C relations). Indeed, each system is built in compliance with the legal system of the reference State so that the system has its own legal value.

In any case, both the Ombudsmen and the service providers of protected reporting systems (such as Crimestoppers in the case of Scotland, STOPLine in the case of Australia to name a few taken up in case studies) need a specific knowledge of the phenomenon in order to better manage the interaction process they are called to perform.

Whichever instrument is used, it is shown that the effectiveness of the whistleblowing system is

⁸ http://www.uefa.com/MultimediaFiles/Download/uefaorg/Clubs/02/14/97/66/2149766_DOWNLOAD.pdf

⁹ For more information, see Global corruption report di Transparency international, 2016, "Ombudsmen and whistleblowing".

strictly linked to the trust that the potential signaler places in the confidentiality of the procedure and in the subsequent effective consideration of his report. The guidelines for the use of a reporting system should therefore indicate, among others:

- if the tool is anonymous, confidential or open;
- the traceability of the report: to whom it is transmitted, how it will be used and which actions can be taken later even at the investigative level with the possible transmission to the police.

In general, the case studies examined show that, to promote the spread of whistleblowing on the subject, awareness-raising courses on match-fixing must be carried out and appropriate procedures developed to promote and encourage whistleblowing as an effective tool to combat said phenomenon.

Table 5 - An orientative global view on existing systems of whistleblowing – EU Countries

Country	Institution promoter	Name of the reporting tool	Modality	Whistler	Report managed by	Issue	Anonymity	Sport
Denmark	Anti-doping Denmark	stopmatchfixing.whistleblownetwork.net	Online platform	All	Police	Doping	Yes	All
Czech-Republic	Czech hockey fed+Transparency Int.	TI CZ	E-mail/phone	All	Lawyer	All forms of corruption in general	Yes	Hockey
Austria	Play Fair Code Assoc.		Ombudsman (e-mail or phone)	Sport actors only	Police	Match-fixing	Yes	All
France	Ethics and Sport Committee		Call center line + in person	Sport actors only	Psychologist, doctor and lawyer	Harassment and abuse	Yes	All
France	French Handball Federation	Handclean	Online	All	Lawyer	Match-fixing	Yes	Handball
UK	Kick It Out Association	Kick It Out	Call center, app and online platform	All		Racism and discrimination	Yes	Football
	Sports Betting Intelligence Unit		Call center	All	Experts	Match-fixing	Yes	All
	Football Association and Leagues	Independent Football Ombudsman	Ombudsman (by e-mail or call)	Sport organizations or consumer		All forms of corruption in general	Yes	All

Country	Institution promoter	Name of the reporting tool	Modality	Whistler	Report managed by	Issue	Anonymity	Sport
Australia	Cricket Australia	Cricket Australia Whistleblower Hotline managed by STOPLine	Call center, online platform, e-mail and fax	Sport actors only	Detective or police	All forms of corruption in general	Yes	Cricket
Finland	Finnish Footballer Players' Association	Players Red Button	Mobile app	Players	Private society and police	Match-fixing	Yes	Football
Germany	3 main football associations	Gemeinsam-gegen-spielmanipulation	Ombudsman (website)	Sport actors only	Lawyer and police	Match-fixing	Yes	Football
Scotland	Main scottish football associations	Keep It Clean Reporting Telephone Line	Call center or a survey	Sport actors only	Specialized experts	All forms of corruption in general	Yes	Football

2.3 The problem of signalling protection

In addition to promoting the "cultural" aspect, it is essential to ensure protection systems for the whistleblower that reports any irregularities. In this case, he acts in the interest of the community, assuming the risk of being retaliated by the defendant because of his report.

Consider, for example, the case of the Cypriot athlete Spyros Neofitides, president of the Cypriot Players Union: Neofitides, following a communication to the Guardian¹⁰ of suspected intimidation against those who want to report suspected cases, was fined and he had to face disciplinary proceedings "for having harmed the image of Cypriot football". Or the case of the South African signer Alviro Petersen: he was temporarily suspended by the local cricket association, Cricket South Africa and the International Cricket Council for reporting that he was contacted for a match-fixing attempt at the South African Cricketers' Association.

The opportunity for the adoption of a protected reporting system together with the need to ensure protection mechanisms for the reporter has been explicitly underlined in the group of experts on the topic of match-fixing established by the EC (EAC / Sport) in the part of the European action plan for sport 2014/2017 under the leadership of its Finnish president Harri Syvasalmi: "*Whistleblowing is also a key to detection: one of the most effective detection methods is a whistleblower report that a match-fixer has made an approach and an attempt to corrupt the course or outcome of a match. It is important that whistleblowers are protected and can come forward without concerns for suffering from reputation or other personal damage (Omitted)*"¹¹.

An examination of the signaling systems protected on the subject in the European and international scenario cannot ignore the verification of the protection measures adopted for the signaler. And, if it is true that all the systems analyzed foresee the guarantee of the whistleblower anonymity (at least up to a certain phase of the investigations), much remains to be done to provide support mechanisms for any discriminatory acts against it.

Beyond the guarantee of anonymity, the proactivity of sports organizations in the adoption of prevention tools against match-fixing can be found in some examples at international level, as in the case of the IOC and the Tennis Integrity Unit (TIU).

In the other cases examined, the protection of the whistleblower is not always well defined and it is referred to general regulatory measures. It seems necessary to build systems that respect not only the legislation on the protection of personal data to ensure the confidentiality of the reporter but also the possible regulation on protected reports so that the reporters feel protected. In this sense, the Council of

¹⁰ Guardian 13 September 2016.

¹¹ <http://ec.europa.eu/transparency/regexpert/index.cfm?do=groupDetail.groupDetailDoc&id=28471&no=1>.

Europe Convention represents a useful regulatory framework of reference.

To conclude, it seems useful to report how some¹² note that, to remedy the problems still in force in the fight against match fixing, it would be desirable to create a supranational authority active in combating sporting fraud that would operate independently from the bodies of sporting discipline and would handle all suspicious reports.

2.4 International Case Studies

2.4.1 Australia

The Australian National Cricket Gaming Federation, Cricket Australia, implemented a protected reporting system to protect the integrity of cricket in Australia: The Cricket Australia Whistleblower Hotline, independently and impartially managed by the STOPLine consulting company, for reporting of violations or unfair faults, even anonymously, in line with the federation's code of conduct.

It stems from the desire of Cricket Australia to adopt the best practices of ethical governance and to be in line with the standards of the Australian corporate governance and the international standards in the field.

STOPLine is an Australian company specialized in providing protected reporting services to protect integrity, serving private companies, including listed companies, public entities and non-profit organizations.

This tool is not only dedicated to match-fixing, but is multi-thematic and also serves to report any offenses such as fraud, theft, dishonesty, incorrect behavior, violations of security measures, bullying and harassment.

The tool works through:

- A dedicated toll-free number (active during working hours 8/20 from Monday to Friday), a website, fax mail and email references; you can remain anonymous or limit the use of your personal data to STOPLine only. These data will therefore not be transmitted to Cricket Australia;
- Feedback and analysis by expert forensic investigators;
- Prompt reporting of incidents to the internal supervisor responsible for integrity in

¹² Global Corruption Report on Sport Transparency international, p. 234: *"One practical solution is to create an independent, anti-corruption agency for sport. Ideally, it would be akin – or even linked – to the World Anti-Doping Agency. It would be financed by arm's-length sponsors and operate separately from sport governance control. It would give whistleblowers and people fighting against sports corruption a secure place to report corruption. If organized and staffed correctly, it would be free from the commercial agendas, professional conflicts of interests and ignorance that clog so much of today's struggle against match-fixing".*

Cricket Australia.

STOPLine guarantees anonymity (through the supply of references and passwords useful for this purpose) but states that some laws guarantee protection only if the reporter identifies himself.

The rules of use of the whistleblowing system also specify that the report does not allow the reporter to avoid the disciplinary and legal consequences of any involvement in the fraud.

It is specified that the players, support staff or officials to whom the provisions of the anti-corruption code of Cricket Australia apply, are obliged, pursuant to arts. 2.4.2 and 2.4.3, to report any event or suspected case aimed at harming the integrity and values of Cricket Australia.

Therefore, if it is possible to use the independent reporting system with the Cricket Integrity Hotline, the use of the report anonymously does not exempt the reporter from fulfilling its obligation under the code of conduct.

In 2014, with the aim of encouraging people to report suspected match-fixing cases and other forms of sports fraud, Cricket Australia has guaranteed amnesty to players and officials with respect to any disciplinary consequences of their failure to report, but not to any involvements in reported fraud.

2.4.2 Austria

The Austrian legislation currently does not provide for a crime of specific fraud to punish the match-fixing, therefore the crime of generic fraud is implemented.

In 2012, a strong focus on the subject has been carried out through the establishment of the association called "Play fair code" at the initiative of the state operator of betting Tipp3 together with the Austrian Ministry of Sport (Sportministerium) and the two representative entities of the football world , the national federation (Österreichischer Fußball-Bund) and the Austrian League (Bundesliga), with the aim of protecting the integrity of the sport.

Subsequently, the founding members were joined by several others: the Austrian Federal Sports Organization, the Austrian Olympic Committee, the sports betting operator's federation, the Austrian lottery and important Austrian betting operators, the ski federation and the federation of ice hockey (Erste Bank Eishockey Liga).

The association is mainly financed by the Austrian Ministry of Sport and receives annual membership fees. The association also collaborates with the sports unit of the Austrian Ministry of the Interior.

Play Fair Code acts as an information platform in favor of sports associations and offers them solutions for the protection of sports integrity in compliance with the reference legal scenario.

The main action strategy adopted by Play Fair Code is essentially based on two pillars: prevention and monitoring to prevent criminal phenomena, also through the establishment of an Ombudsman to receive reports on match-fixing cases in sports in Austria.

The Play Fair Code prevention activities are carried out through awareness-raising courses on the subject and education with a top-down approach aimed at professional athletes (including future professional athletes) as the first group of recipients, followed by a confrontation with professionals, semi-amateur and professional athletes, referees and representatives of the sports world (sponsor / media). The purpose is to expand training activities to amateur sport.

In educational courses, athletes, coaches and managers are informed about how international mafias, infiltrated the betting world, try to undermine professional sport at an international level. Similarly, they are informed on how to face the risks and consequences for an athlete if involved in a sports fraud. An interview with a well-known Austrian professional footballer involved in a sports fraud case is available on the Play Fair Code website.

2.4.3 The Ombudsman in Austria

In February 2014, Play Fair Code has set up an Ombudsman, carried out by lawyers who are experts in sports law (Niederhuber & Partner), who provide this service free of charge, handling all the information received in a confidential manner, by e-mail or by phone, with availability 24 hours a day, seven days a week. They also receive and process anonymous reports.

The Ombudsman is a first point of professional and confidential contact for athletes and other stakeholders in the sports world who hold information about scheduled match-fixing activities or may have been involved in the preparation of these.

The types of people they report are essentially athletes, even from youth sections, sports directors, but also their family members.

The Ombudsman can contact and inform Play Fair Code, but only with the prior consent and in close cooperation with the reporter.

In general, the Ombudsman reports to Play Fair Code only the results of its activity, on a six-monthly basis, without affecting the confidentiality of the report.

The Ombudsman offers assistance and advice on how to best manage suspicious and potentially dangerous situations in relation to match fixing.

Unlike the Ombudsman set up by football organizations in Germany that, in fact, manages football-related reports only, the Ombudsman who supports Play Fair Code manages reports regarding all types of sports.

The adoption of this solution was considered preferable rather than the implementation of an IT whistleblowing platform due to the difficult management of the privacy of the underlying personal data that would have involved years of work and delays in implementation. Furthermore, a single telephone signaling system (for example the Austrian government agency "Nationale Anti-Doping Agentur", active in doping) is

not considered as an effective tool due to the risk of a possible voice recognition.

Furthermore, it is worth noting that the Play fair code association also receives some reports in a direct way. Play fair code then contacts the competent police authorities and the respective sports federations for disciplinary sanctions, with the consent of the reporter.

Please note that, pursuant to the Austrian Football Association Disciplinary Regulations, football players are explicitly prohibited and are sanctioned with administrative penalties, to bet directly or indirectly on their own team or on another team active in the same series or to disclose confidential information to third parties that could be used for betting. Failure to report cases of suspected sporting fraud is also punished.

In practice, it is reported that the reports made directly to Play fair code are on the increase while those to the Ombudsman are decreasing. This is because the direct approach, based on mutual trust and knowledge, appears to be prevalent.

The Play fair code association has been operating for over four years and has developed an important know-how as well as a strong credibility both nationally and internationally through the exchange of good practices at both levels.

It can validly be argued that the Austrian government, through the association tool of Play fair code, represents a pioneer country in the fight against sports fraud through the cooperation between authorities, sports organizations and betting operators. Furthermore, this association represents a forerunner of some provisions of the Convention of Council of Europe signed by Austria, in particular with regard to the establishment of a national platform for the implementation of preventive, awareness-raising, risk assessment and coordination tools among the various stakeholders.

Presumably, the Play fair code will be involved in the supervision, together with the federal criminal police authorities, of the constitution and functioning of the national platform to be implemented under the Council of Europe Convention.

2.4.4 Finland

The Finnish legislation currently does not explicitly provide for the crime of sports fraud nor the possibility of reporting anonymously in a protected and safeguarded environment.

In 2010, the Finnish Football Association (Finnish Footballer Players' Association - Jalkapallon Pelaajayhdistys - JPY) began to study and implement a mobile application for reporting suspected cases of manipulation of games in favor of players called Players Red Button, active since 2013.

This is an anonymous protected reporting system, which can be activated by players, using a software developed by JPY itself and downloadable on their mobile phones. Only players can activate the protected Red Button reporting system through their union.

With regard to its functioning, it is reported that:

- The union has previously informed the players about the handling of match-fixing, sports bets and the consequences of making illegal bets or sports fraud.
- Each player receives a secret code (ID code) to access the application. The same application contains information and educational messages for the players.

The purpose of this application is to favor any reports from players regarding a direct contact with a match-fixer or whether he has had knowledge or rumors of a possible suspected match-fixing case, protecting the same: before the development of this instrument, if a player became aware of a possible manipulation of a game, he did not know who to contact and what repercussions there would have been in reporting this information.

How this application works:

- the player makes an anonymous report through the easy to use Red Button;
- the report is made in a protected and safe environment - there is no way to trace the origin of the messages sent;
- the report of the player is directly transferred and managed by a company active in the security sector, twenty-four hours a day, seven days a week. No one else is informed of the report;
- the report is transmitted as it was received to the police bodies only in the event that the nature of the report is deemed to be serious;

Of course, law enforcement agencies evaluate this information along with others from other sources, before initiating any investigation.

The FIFPro has funded this application, as part of the "Don't Fix IT" project which involved, as other partners, the UEFA, the London University Birkbeck and the Ministry of Finnish Culture.

The application is now available in Finland, Sweden, Norway, Switzerland, Poland, Denmark, Cyprus and New Zealand. The content of the application is adapted to the individual country (c.d. country-specific application) with specific ID codes; affixing the logo of the reference union and national URLs of reference.

2.4.5 Germany

In recent days, the Parliament has voted a new law for the sanction of sports fraud crimes, concerning also sports bets: altering sporting events to obtain illicit profits with bets can lead to a sentence of up to three

years in prison.

In May 2011, the German Football Federation (DFB) and the German Football League (Ligaverband) and the company that manages the Bundesliga German Football League Association (DFL), adopted a common prevention program to protect sports integrity, called "Play fair!", in order to inform and educate its members about the dangers of match-fixing and corruption to encourage betting.

The need for a prevention program stems from a common intention that, since 2005, aimed to closely monitor irregular betting flows and schemes. It also provided adequate information and educational support (through brochures, flyers and posters in the changing rooms) in order to increase the awareness for the players of the dangers of match fixing, illegal bets and the risk of gambling addiction.

The program, built together with the assistance of the German Transparency International unit and the Federal Centre for Health Education (BZgA), initially set up for young footballers and coaches, is now aimed at all categories of players (men and women), coaches, managers sportsmen and referees. Through the slogan "Tackle match-fixing - play fair!", the program seeks to make them aware of the risks (personal and general on career / sport / responsibility), the origins, the methods and the consequences of match fixing.

Players, coaches, assistants and managers discover that they cannot bet, according to the DFB and DFL rules, on the matches of their own team or on competitions in which their team is playing. Similarly, the referees active on leagues on which it is possible to bet, cannot generally bet directly or via third parties. In addition to match fixing, the disclosure of confidential information (such as the absence of a regular player, tactics or the appointment of an arbitrator) is prohibited and sanctioned by sports legislation.

Please refer to the website for more information on the materials www.gemeinsam-gegen-spielmanipulation.de (in German) that hosts an e-learning course made specifically for football players.

2.4.6 The Ombudsman in Germany

An integral part of the "Play fair!" Program is the figure of the Ombudsman. It has been established by the three organizations, and it is a key figure for the first contact with players, coaches or assistants in case of the first suspicions of a possible sporting fraud or the first contact.

This figure, together with the betting monitoring program and the player prevention/education program, is a well-functioning prevention and contrast tool that other countries are considering adopting. Several match-fixing cases involving referees and players have thus been identified and sanctioned (both with monetary and exclusion penalties).

The Ombudsman is a lawyer, formerly a football coach, who can be contacted, in a secure and independent way, both by telephone and by email through a website available in German language: www.gemeinsam-gegen-spielmanipulation.de. He provides advice and examines any reports received.

The reporter may decide to report it anonymously or by revealing his identity. In this way, players, coaches and referees can get advice even in cases where there is a simple initial suspicion and can prevent a possible manipulation.

The Ombudsman conveys it to the legal departments of the DFB and DFL. He supports the evidence acquisition process and participates in the decision-making process if he reports the case further. The Ombudsman is obliged to inform the reporter about the course of his report.

The DFB has two disciplinary bodies that deal with suspected match-fixing cases. Likewise, these two bodies deal with the issue of how suspected match-fixing cases constitute violations of the federation's disciplinary rules: the first organ, the "Sports Court" is the first to be questioned for suspected cases and is composed of a president, a vice president and 29 members. The second, the "Federation Court" acts as an appeal body and consists of a president, a vice president and 28 members. For both bodies, the leaders are elected by the general assembly of the federation.

It should also be noted that the DFB and the EPFL have developed a pilot program of prevention and education on the subject, called "Staying on Side". The aim of the program is to provide the materials, available to all European football leagues, for young footballers, professionals and sports officials. For its part, the EPFL has developed a code of conduct on sports betting integrity (Code of Conduct on Sports Betting) approved by the twenty associated leagues that forced them to adopt educational programs.

2.4.7 UK

At institutional level, it is worth mentioning the initiative of the Gambling Commission, a regulator body for English gaming activities (with the exception of the national lottery). This commission, together with various partners sports organizations, betting operators, reference associations and police authorities has established in 2012 the Sports Betting Integrity Forum (SBIF) to counteract corrupt actions in sports and sports betting.

The Forum is part of the British national action plan to fight against match-fixing risks and to promote the integrity of sports bets. Its purpose is to coordinate the efforts of the various partners in implementing the national action plan, identifying potential critical issues and solutions.

It is worth emphasizing the role of the Sports Betting Intelligence Unit (SBIU) that supports the Gambling Commission in coordination with the other partners in implementing the afore mentioned action plan and in managing the reporting of suspected match-fixing cases linked to bets. This is in order to protect the player in betting in a protected and transparent environment with authorized operators in the United Kingdom.

The SBIF has implemented a protected reporting system that provides the possibility, addressed to anyone, to report any suspicious betting activity or other information that could threaten the integrity of the sport.

The report is made by telephone to the Gambling Commission through a confidential line (confidential intelligence line (0121) 230 6655) where it is not necessary to provide personal details. Calls are received by properly trained staff and are treated with the utmost confidentiality.

In Scotland, the non-profit organization under English law Crimestoppers has been managing, since January 2014, an anonymous reporting system called "Keep It Clean Reporting Telephone Line".

The creation of this instrument was financed by the main stakeholders involved in Scottish football: Professional Footballers' Association Scotland (PFA Scotland), Scottish Professional Football League (SPFL), the association of managers and coaches together with the Scottish Football Association (SFA).

The report can be made by telephone. Calls are not recorded and anonymity is guaranteed so that there is no possibility of identifying the reporter, except in the event that the reporter does not intend to use confidentiality.

The system is available twenty-four hours a day, seven days a week.

The telephone service is available to players, coaches, managers, club managers and administrative staff and allows the reporting of any problematic or suspicious information relating to four main themes:

- sports fraud (match-fixing);
- doping;
- illegal bets;
- sports integrity.

It is possible to use the protected reporting system also by filling out an online questionnaire at the following link: <https://crimestoppers-uk.org/give-information/give-information-online/>. In both cases, the answers will be provided by highly qualified and trained personnel working with Crimestoppers.

Only in the event that such reports are considered sufficiently serious by the SFA to start an investigation, they are shared with other stakeholders, with particular reference to PFA Scotland in the event of the involvement of a player.

Together with the activation of the telephone reporting line, all the Scottish teams, cd. Senior clubs, receive informational and educational material to raise awareness on the match fixing issue.

However, it should be noted that, at a national level, the Gambling Commission has entered into a partnership with Crimestoppers so that the reports received via Crimestoppers are sent to the Gaming Commission's SBIU together with the transmission to the police authorities.

At national level, although not directly linked to match fixing, it is worth noting that, in July 2008, the English football authorities, namely the Football Association, the Premier League and the English Football League - after consultation with the sports department of the British Government, the Department for Culture, Media and Sport (DCMS) - have established the figure of the Independent Football Ombudsman (IFO) to examine and judge cases not resolved by the same authorities by the various clubs that involve consumers.

Specifically, the IFO consists of the Ombudsman, his deputy and a committee of experts in legal, regulatory and financial matters to name a few, that the Ombudsman can contact in case of special needs. It succeeds to the previous entity, the Independent Football Commission (IFC) which operated from 2002 to 2008 as an integrated part of the football self-regulation system in the United Kingdom. In February 2016, the IFO was accredited as an ADR institution under the 2015 Alternative Dispute Resolution Consumer Regulations, so it is part of a European ADR platform.

The purpose of the IFO is to verify cases handled by sports organizations in relation to consumer relations from a procedural point of view (competence of the sports authority of reference, reasonable duration, response times, etc.). In fact, this can only intervene to resolve issues that have already been addressed before by the reference sports organization. The topics covered are usually: ticketing, merchandising, accessibility to facilities, application of codes of good conduct and guidelines. It can be contacted by post, by email or by phone.

The IFO does not have competence for the behavior of players on the field, for incidents or for the decisions of the referees, nor is it responsible for grassroots football or for the county of football associations. His competence is limited to the English league's clubs and to the competitions that fall within the organizational sphere of the three football authorities.

The IFO falls under the self-regulation framework of the football authorities. Its decisions are made public on the IFO website and although not binding, they are generally respected. Being in any case subject to compliance with the privacy legislation, the IFO must not make a decision public if the party specifically requests it. An annual report is produced for the attention of the Minister of Sport and sports authorities, which is then made public.

2.4.8 FIFA

Considering the assumption that the majority of match-fixing cases derive from a fraud in a sporting event aimed at obtaining an illegal gain from betting, in 2007, FIFA adopted a prevention system

called "Early Warning System", to monitor betting flows with particular reference to changes in the odds and an analysis of the results of FIFA football competitions, including the world cup and qualifying matches.

In 2001, in order to support actions against the manipulation of football matches, FIFA signed an agreement with INTERPOL, the world criminal police organization.

In 2012, FIFA adopted a new ethical code aimed at all officials and footballers, entering sanctions to protect the integrity and reputation of football in FIFA.

Moreover, to facilitate the reporting of match-fixing or attempted approaches by manipulators, FIFA has established several anonymous reporting methods, primarily aimed at all members of the association, players and referees, who can report any suspected breach of the FIFA ethical code or violations of the FIFA rules in relation to the fight against manipulation of matches in FIFA - either directly on an anonymous basis or through a third party - through:

- a dedicated telephone line (hotline 00418000113388);
- an email or online reporting system: <https://www.bkms-system.net/FIFA>.

Privacy wants to help overcome the mistrust or fear of the sportsman who is afraid to report what he has learned or what has happened to him.

Certainly, the information acquired through anonymous reports represents only a small part of a successful investigative process by police or sports organizations that combine a series of direct and indirect proofs.

The reporting process via website involves several phases:

- the first asks the reporter to read the information on identity protection and complete a security questionnaire;
- the second one asks the reporter the description of the report in a given space and format and answers to specific questions. The report will receive a reference number after sending;
- the third one asks the reporter to install a protected postal address - through the BKMS® System technology that protects the anonymity - which will be used to communicate with him, answer his questions and inform him of the status of the report;

FIFA encourages each of its members to make reports within their country.

According to FIFA, a set of signaling mechanisms protected at regional, national and international level can better assist those who intend to make reports by choosing a reporting system with which they feel most protected.

The Asian Football Confederation (AFC) is the governing body for football in Asia and is one of the six confederations that is an integral part of FIFA. The AFC has recently equipped itself with an anonymous protected reporting system as part of a new internal policy to hinder the handling of "Do the right thing" matches. The intention of the AFC Governance Reform Task Force is also to equip itself with an independent figure responsible for integrity.

Finally, we can mention the recent membership of the Football Association of Malaysia (FAM) and the Malaysia Super League (MSL), in August 2016, to the Early Warning System (EWS) of FIFA which provides, in addition to the monitoring activity of the matches of the league and international matches hosted in Malaysia, also the protected reporting system described above

2.4.9 UEFA

Since 2012, UEFA has also felt the need and provided itself with tools to protect the integrity of European football, coming:

- the adoption of a code of conduct on 18 September 2014¹³ to provide guidance to footballers, referees, staff and various figures who are involved in European football in various capacities; and
 - the establishment of several reporting systems protected by:
 - a telephone line with an international toll-free number +80,000,010,002, currently available in five languages (German/English/Chinese/French/Russian);
 - a secure website (www.uefa.integrityline.org);
 - a mobile application, called UEFA integrity app, available in seven languages and downloadable free of charge, where information, advice, videos are available, as well as the possibility to report in a completely anonymous way information or suspicions related to possible cases of match-fixing.

UEFA's disciplinary rules require its members, member clubs and contractual persons to report any suspicious activity¹⁴.

¹³ Already cited

¹⁴ The text of art. 12 of the rules of discipline is given below "Article 12 Integrity of matches and competitions and match-fixing:

1. All persons bound by UEFA's rules and regulations must refrain from any behaviour that damages or could damage the integrity of matches and competitions and must cooperate fully with UEFA at all times in its efforts to combat such behaviour.

However, UEFA is aware that whistleblowers prefer an anonymous, untraced whistleblowing tool and would prefer the application-based reporting tool (where even the IP address is not tracked) which is considered more dynamic than the telephone line.

Significant is the accessibility of these whistleblowing tools to any person who intends to report and not only to athletes or members of the association.

It should be noted that, at UEFA level, the only means of protecting the reporter is anonymity, but they are still working on a system of protecting the reporter.

UEFA is opting to extend these whistleblowing tools also as a prevention instrument to combat doping.

2.4.10 IOC

In 2015, the IOC decided to endow itself with rules and implement measures to protect and support "clean" athletes and the integrity of the Olympics through information and educational programs and international cooperation in data collection to support any investigation.

Among these measures, the IOC adopted in 2016 a code of ethics that establishes, among other things, the obligation to report any violations of the code, including through the mechanism of protected reporting established¹⁵.

2. *The integrity of matches and competitions is violated, for example, by anyone: a) who acts in a manner that is likely to exert an unlawful or undue influence on the course and/or result of a match or competition with a view to gaining an advantage for himself or a third party; b) who participates directly or indirectly in betting or similar activities relating to competition matches or who has a direct or indirect financial interest in such activities; c) who uses or provides others with information which is not publicly available, which is obtained through his position in football, and damages or could damage the integrity of a match or competition; d) who does not immediately and voluntarily inform UEFA if approached in connection with activities aimed at influencing in an unlawful or undue manner the course and/or result of a match or competition; e) who does not immediately and voluntarily report to UEFA any behaviour he is aware of that may fall within the scope of this article.*

3 *If filed after the relevant competition stage has finished, complaints regarding match-fixing can have no impact on the sporting result of the competition or match in question and, therefore, the match cannot be replayed, unless the competent disciplinary body decides otherwise."*

¹⁵ Chapter G art. 18 of the Code of Ethics of the IOC: "*The Olympic parties shall inform the IOC Chief Ethics and Compliance Officer, in the strictest confidentiality and by using the appropriate mechanisms, in particular the IOC Ethics and Compliance Hotline, of any information related to a violation of the IOC Code of Ethics, with a view to possible referral to the IOC Ethics Commission. Any disclosure of information must not be for personal gain or benefit, nor be undertaken maliciously to damage the reputation of any person or organization."*

In fact, the IOC has set up a dedicated system, called "Integrity and compliance hotline" to collect reports via the web, ensuring confidentiality and anonymity, on suspected cases of match-fixing, financial misconduct or other violations of the code of ethics of the IOC.

In fact, with regard to combating the manipulation of football matches, the system calls for the use of whistleblowing systems offered by UEFA or FIFA. Similarly, the system refers any reports of doping to the national body of reference or the World Anti-Doping Agency (WADA).

The reporting system adopted remains multi-thematic. The reporters can be athletes, coaches, referees or also the public.

The system guarantees:

- confidentiality: the identity of the reporter is not communicated outside of the people who follow the report without his prior consent;
- anonymity: any reporter may decide to report anonymously and the IOC undertakes to respect this anonymity;
- protection: the IOC takes appropriate measures to protect the reporter from any nuisance, retaliation or work consequences by sanctioning the reporter with appropriate disciplinary action and by assisting the reporter against any unjustified treatment with the assistance of law enforcement authorities, if deemed necessary in the event of physical threats. This assistance will be interrupted if the reporter has voluntarily provided false information.

Significant, in the protected reporting system implemented by the IOC, is the focus put on the protection of the reporter who goes beyond the simple guarantee of its anonymity.

With regard to anonymity, it should be noted that the IOC still encourages reporters to divulge their data to ensure "adequate feedback".

Reports relating to manipulations of sporting competitions are handled by the ad hoc unit, the IOC Integrity Betting Intelligence System (IBIS), which makes an initial valuation of the case in order to assess the competence of the IOC and the need to initiate an investigation or not.

If the suspected sports fraud occurs outside the period of the Olympic Games, the report is transmitted to the competent unit of the international sports federation and to the police authorities if a possible crime is detected.

2.4.11 TIU

Already in 2008, the TIU was established, an independent organization active in the fight against corruption in professional tennis worldwide, by the main sports organizers in sport: The International Tennis

Federation, the Association of Tennis Professionals (ATP), the Women's Tennis Association (WTA), the Australian Open, the French Open, Wimbledon and the US Open.

In order to protect the integrity of tennis, including betting, the organization has entered into agreements with betting operators and regulators both directly and within the framework of the Britain SBIF set up by the UK gaming regulator¹⁶. It cooperates regularly with federal, national and EUROPOL police forces. It also works with the IOC on the implementation of anti-corruption rules for tennis matches at the Olympic Games.

TIU has implemented a policy of "zero tolerance" to corruption in the world of tennis, particularly through betting, based essentially on three pillars:

- the Uniform Tennis Anti-Corruption Program (TACP), which contains standard principles applicable to all professional players and those involved in their work (coaches, managers, physiotherapists, etc. Related persons¹⁷);
- investigation and application of sanctions for those who violate the TIU code;
- training of players through the mandatory attendance of the Tennis Integrity Protection Program (TIPP) course to raise awareness of the issue, facilitate the identification of situations at risk and the reporting of suspicious cases.

With particular reference to the reporting of suspicious cases, TIU has implemented a reporting system for players, available 24 hours a day, seven days a week, which guarantees the confidentiality of the reporter. This reporting system works with reports made via email confidential@tennisintegrityunit.com, which is considered preferable to a telephone reporting system.

¹⁶ See UK case study.

¹⁷ Within the meaning of Chapter B, p. 21 of the TACPs: "Related Person" refers to any coach, trainer, therapist, physician, management representative, agent, family member, tournament guest, business associate or other affiliate or associate of any Player, or any other person who receives accreditation at an Event at the request of the Player or any other Related Person.

In any case, it should be noted that, according to the provisions of the TACP, the players¹⁸, the Related Persons and the staff present at the tournaments¹⁹ are obliged to report not only any crimes of which they have become aware but also only any suspicious cases. In this circumstance, the application of any sanctions may be reduced to the reporter²⁰.

¹⁸ Within the meaning of Chapter D, p. 2) (a) of the TACPs: “Players. i. In the event any Player is approached by any person who offers or provides any type of money, benefit or Consideration to a Player to (i) influence the outcome or any other aspect of any Event, or (ii) provide Inside Information, it shall be the Player’s obligation to report such incident to the TIU as soon as possible. ii. In the event any Player knows or suspects that any other Covered Person or other individual has committed a Corruption Offense, it shall be the Player’s obligation to report such knowledge or suspicion to the TIU as soon as possible. iii. If any Player knows or suspects that any Covered Person has been involved in an incident described in Section D.2.b. below, a Player shall be obligated to report such knowledge or suspicion to the TIU as soon as possible. iv. A Player shall have a continuing obligation to report any new knowledge or suspicion regarding any Corruption Offense, even if the Player’s prior knowledge or suspicion has already been reported.”

¹⁹ Within the meaning of Chapter D, p. 2(b) of the TACPs: “Related Persons and Tournament Support Personnel. i. In the event any Related Person or Tournament Support Person is approached by any person who offers or provides any type of money, benefit or Consideration to a Related Person or Tournament Support Person to (i) influence or attempt to influence the outcome of any aspect of any Event, or (ii) provide Inside Information, it shall be the Related Person’s or Tournament Support Person’s obligation to report such incident to the TIU as soon as possible. ii. In the event any Related Person or Tournament Support Person knows or suspects that any Covered Person or other individual has committed a Corruption Offense, it shall be the Related Person’s or Tournament Support Person’s obligation to report such knowledge or suspicion to the TIU as soon as possible.”

²⁰ Within the meaning of Chapter H, p. 5) of the TACPs: “Substantial Assistance. The (integrity officer) AHO may reduce any period of ineligibility, either at the time of the original decision or subsequently (by reconvening), if the Covered Person has provided substantial assistance to the PTIO or the TIU that results in the discovery or establishing of a corruption offense by another Covered Person. Upon application by the Covered Person pursuant to this provision, the AHO shall establish an appropriate procedure for consideration of the application, including the opportunity for the Covered Person and the PTIO to make submissions regarding the application. The AHO has complete discretion in consideration an application for reduction of a penalty under this provision.”

3. Desk Analysis on legal framework and ongoing reporting system in T-PREG partners

The desk analysis done shows that in the countries involved in the project, a first legislative effort has already been made on the issues of transparency, integrity and the regulation of the betting system. In some of those countries such efforts come to directly involve the sports context, in others, instead, actions have a framework linked to more general contexts.

In Portugal 2017 was crucial: during the same year, indeed, had been passed two important laws. The first one, law 13/2017, has introduced the unsporting bet crime, the second one, 101/2017, was passed to defend transparency and integrity in sports competitions.

The attention of sports governing bodies, as the Portuguese Football Federation, the National Football League, the Union of Professional Football Players and the Olympic Committee of Portugal, moreover, is focused on organizing awareness raising campaigns on these problems.

In relation to the reporting platforms, there has been promotion of an on-line platform, dedicated to football, by the Portuguese Football Federation, the National Football League and the Union of Professional Football Players (<https://integridade.fpf.pt>).

In Slovenia, the whole betting sector is regulated by the Criminal Code. In particular, article 212 prohibits organizing pyramidal money schemes and cooperation in betting activities. The control over all gambling activities is conducted by the Department for Control over Gambling Activities, as a part of the Ministry of Finance.

As far as sport is concerned, the Slovenian Football Association has adopted the Disciplinary Rulebook regarding disciplinary offenses committed by players and officials.

Another important step was taken in April 2018, when the Football Association of Slovenia accepted its Integrity Code, which defines basic guidelines and principles aimed at safeguarding the integrity of football. Recently, the Athlete Syndicate of Slovenia and Interpol have been promoting a series of awareness campaigns on integrity in sports.

In relation to the reporting question, there are two online platforms in Slovenia dedicated to all integrity issues. These two platforms are managed by the National Olympic Committee and the Football Association (<https://zvizgavka.olympic.si/>).

In Belgium, betting is regulated through the Federal Act of 7 May 1999 on Games of Chance, Bets, Gaming Establishments and the Protection of Players, which was amended in 2010 and 2019. Via this act, the government implemented a policy aimed at regulating gambling activities by way of licenses, awarded by the Gambling Commission. This Commission reports to the Ministry of Justice (www.gamingcommission.be/opencms/opencms/jhksweb_nl/home/). Hence, the Gambling Commission is responsible for the control of all gambling activities in Belgium. The Federal Act of 1999 as well as the internal

rules of several sports organizations prohibit players, trainers and officials to bet on games they are participating in. In addition, several sports organizations (e.g., Royal Belgian Football Association - RBFA) organize awareness campaigns to preserve the integrity of sports competitions.

With regards to reporting systems, the law enforcement agencies created a hotline for reporting fraud in sports along with the Ministry of Justice and the Ministry of the Interior. The initial scope of the hotline was confined to football, but in 2013 the scope of the hotline was extended to other sports as well (<http://sportfraude.be/>). In addition, the RBFA has its own hotline for reporting fraud on its website ([www.belgianfootball.be/nl/competities/ meldpunt-competitievervalsing](http://www.belgianfootball.be/nl/competities/meldpunt-competitievervalsing)). Tennis Vlaanderen has a single point of contact available to report any incident related to match-fixing in tennis in Flanders. These two sports federations rely on educational activities to promote reporting. In order to coordinate the initiatives aimed at combatting match-fixing, a national platform was created in 2016. Via this platform, the different actors, i.e. the police, prosecution services, government, sports federations etc., work closely together around match-fixing.

In Spain, there are two laws that regulate integrity and the protected reporting systems: The Law on Data Protection (article 24) and the Royal Decree-law 11/2018 that regulates prevention of money laundering. To date, there isn't a specific law on the protection of whistleblowers and there is not any single institutional body commissioned to receive the reporting. There are, conversely, diverse reporting channels, but in the middle of legislative vagueness. Moreover, not all organizations are aware of the minimum requirements that a secure reporting system must possess in order to be effective and safe.

In 2016, a proposal of a Comprehensive Law to Combat Corruption and the Protection of Whistleblowers has been presented, but it is still under discussion.

In relation to the reporting platforms, they have been promoted two online platforms. The first one is the Royal Spanish Football Federation (RFEF) website which has a specific protected reporting system on general transparency issues, but it is found in the «suggestions or questions» section, without specification about the protection of the reporter nor confidentiality. The second one is the Royal Andalusian Football Federation (RFAF), a well-established hotline for citizen access, where many issues can be denounced via e-mail.

In Italy, the Law 401/89 has introduced the fraud crime in sporting event. In 2011, a strong and important governmental action was to create the Sport Betting Information Unit (UISS) under the control of the Department for Public Security, and the Sport Betting Investigative Unit (GISS), under the control of the Criminal Analysis Service, the “Gioco Anomalo Scommesse Sportive” (GASS), that coordinates activities. This system, based on a private-public partnership, has been a highly innovative solution.

Since 2011, there is also a National platform (www.sportpulitoitalia.it; www.rischioreatosport.it). It is under the control of the Sports Office of the Italian Government, involves Legal experts and Psychologists

and consists in an Online Platform with the possibility to have telephone contacts for the protected reporter.

In 2017, finally, Law 179 for the protection of whistleblowers was approved.

Below are two in-depth focuses related to two initiatives of particular interest for the project. The first is the Italian system launched in 2011, UISS and GISS. It is a best practice that demonstrates how an integrated public-private system can effectively manage, through coordination of investigation and reporting, the problem of match-fixing reporting.

The second one is an interesting study on the visualization, access and information of some Spanish reporting systems. It shows how a scientific and meticulous analysis of these aspects can help make the reporting mechanism easier and more effective.

Table 6 - Ongoing reporting systems in T-PREG Countries

Country	Promoter Institution	Name/website	Modality	Whistler	Report managed by	Issue	Anonymity	Sport
Italy	Sport Office of Government	www.sportpulitoitalia.it www.rischioreatosport.it	Online Platform + telephone contact	All	Legal expert and Psychologist	All integrity issues	Yes	All
Portugal	3 main Football organizations	www.integridade.fpf.pt	Online Platform	Sport actors only		Match-fixing	Yes	Football
Spain	Royal Spanish Football Fed.; Andalusian Footb.Fed		2 online platforms	Football players		All integrity issues	Not specified	Football
Slovenia	National Olympic Committee and the Football Association	Žvižgavka'	2 online platforms	Athletes	An expert	All integrity issues	Yes	All
Belgium	IOC in collaboration with Interpol and National Federations		Hotline + education programmes	Sport actors only		Match-fixing	Yes	All

3.1 Focus: an organizational best practice. The Italian public-private reporting system

GASS coordinates UISS and GISS to continuously monitor sports betting data using designed software.

The Italian system contemplates a public-private partnership mechanism between the concession holders in the betting industry and the Customs and Excise Agency, which has instituted a special crisis unit – GASS – to monitor sport betting data via a dedicated software program.

In addition, the communication and relational difficulties so far encountered demonstrate that in the current Italian system the partnerships between public and private actors should be increasingly promoted and supported.

What the Customs Agency is able to do today, a public body that is also responsible for monitoring, "is great but it is limited because they are only able to observe that part of the operators who are the licensed operators". Thus, there is a whole range of activities not being monitored that can only be observed by partnering with private betting operators, even internationally.

Overall, UISS-GISS and GASS is a system that works well and so it would probably be worth increasing the synergies even more, especially by expanding the sharing of information among the various actors to avoid some parties remaining unaware as risky situations develop or improving the tools they have.

The presence of an organization that reports and another that investigates is indicative of the level of prevention built into the system. Moreover, the guidelines of the two organizations – which determine how the information must flow – are updated to better adapt to the changes and evolution of the organizations and the phenomenon itself.

Respondents also suggested some elements to improve/strengthen this coordination mechanism, in particular:

- Improve the quality and quantity of shared information;
- Improve the pre-emptive identification of risk scenarios and the timeliness of alert procedures, as well as the ability to target investigative actions in order to strengthen prevention measures;
- Encourage a rapid feedback to the licensed operators of the exchange of information and actions to be taken (a tool that would be desirable to also handle the feedback and sharing with all operators who might be unaware of the risky situations that are developing).

However, it has also been stated that "even if the car is good it still needs fuel". In fact, some critical issues have been raised.

- Compared to companies operating in the sector, only 60-65% of bets are monitored by the Customs and Excise Agency. Therefore, only a portion of the phenomenon is being monitored (about all betting activities carried out online and abroad);
- Often officials are not informed "promptly" because of the confidentiality of investigations;
- Sometimes data streams are unreliable, and even if they are valid, feedback from the operators is not always immediate.

3.1.1 UISS

In 2011, the Minister of the Interior created the UISS under the Department for Public Security, chaired by Deputy General Director for Public Security – Central Director of Criminal Police. The Unit has the following tasks:

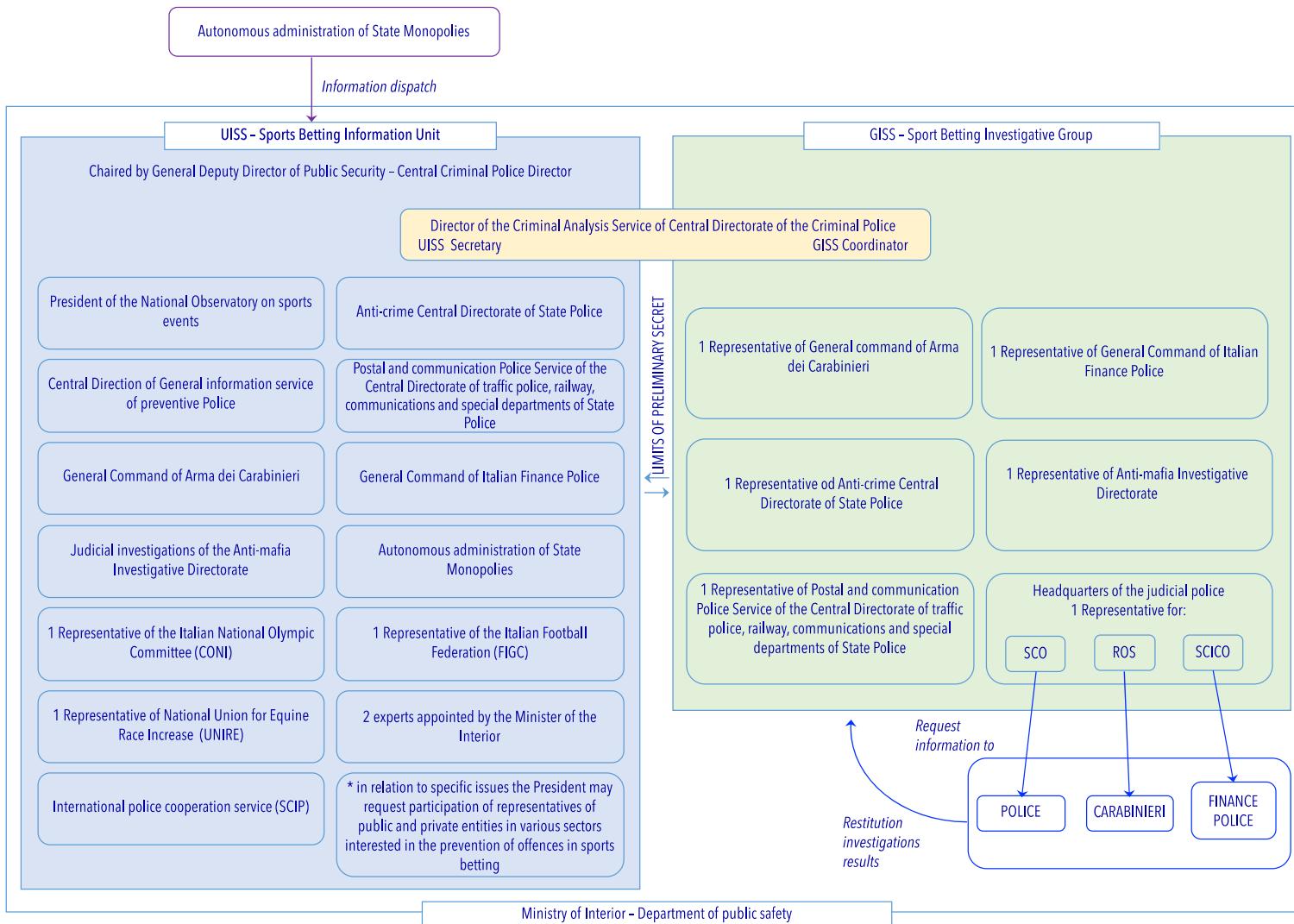
- Monitoring and analyzing news sourced by those organisms tasked with sport events organization, management and control – including news concerning the prevention of violence in sport events – under Law 401/1989, for the purposes of preventing and combating crimes in the betting business.
- Proposing suitable prevention and countering strategies as well as initiatives targeted at increasing international cooperation among police forces.

UISS is composed of representatives of the Police Forces, the Customs and Excise Agency, Italian Olympic Committee (CONI), Italian Football Federation (FIGC) and National Union of Horse Breeds (UNIRE), as well as two experts appointed by the Ministry. The decision to specifically involve representatives of some sports federations is due primarily to the fact that reports of suspected manipulation first arose in those sports.

3.1.2 GISS

In the same time, the Minister of the Interior established also the GISS, the Sport Betting Investigative Unit, whose tasks include promoting and liaising contrast infiltration attempts into the sport industry, also at the hands of organized crime. The GISS is coordinated by the Director of Criminal Analysis Service.

Figure 1 - UISS-GISS integrated organizational structure



It is composed of one representative of the General Command of the Carabinieri; a representative of the General Command of the Guardia di Finanza; a representative of the Central Anti-Crime Department of the State Police; a representative of the Anti-Mafia Investigative Directorate; a representative of the Postal and Communications Police Service from the Central Command of the Traffic Police, Railway Police, Communications Police and Special Departments of the State Police; and a representative of each of the command centers of the judicial police (Central Operational Office - SCO, Special Operational Unit - ROS and the Central Organized Crime Investigating Office - SCICO). The GISS, upon receiving reports about abnormal flows, duly investigates on the reported matter and deploys any other investigative resources available to it. More specifically, SCO, ROS and SCICO can turn for further investigation to the Italian Police, Carabinieri and Guardia di Finanza (which, if need be, will be tasked with notifying the outcomes of the investigation to the state courts).

3.2 Focus: studying visualization, access and information of reporting systems

The aim of this initiative is to conduct a study of the current situation of the reporting systems in the different football Spanish bodies, analyzing their visualization, access and information prepared for the complainants that are exposed in its web portals and is public access for any citizen or relevant stakeholder.

Although the research focuses on football, it is necessary to know the current state of all the bodies connected by this sport. The relevance or content of the information obtained is necessary to make an analysis of anybody that may be influenced or be part of a possible testimony or investigation.

3.2.1 The CSD website

In this case, the analysis of the chosen websites was carried out in a hierarchical way, starting the study through the Spanish National Sports Council (CSD) Website, since is an organ that has authority over the different sport areas, and therefore, having a direct link with this body is be very relevant for the research and the training part that the project requires.

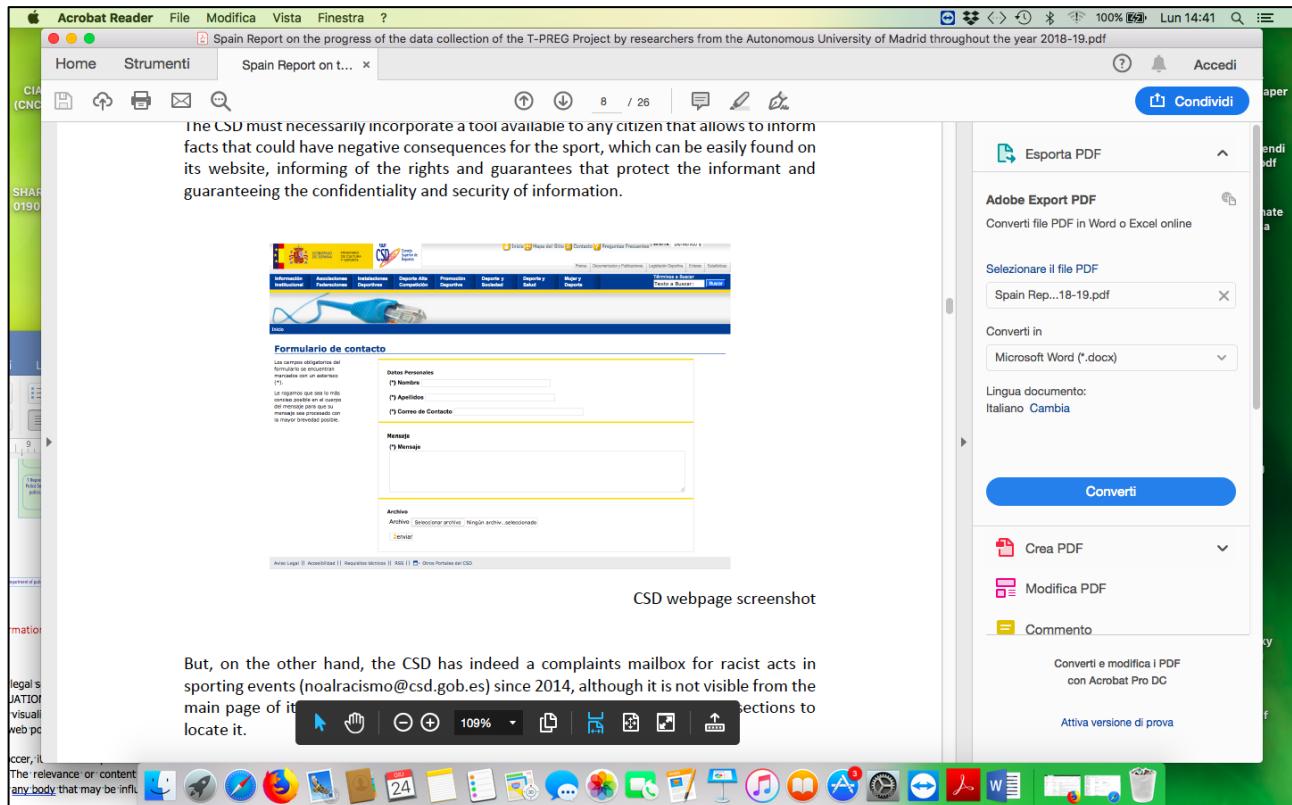
Currently, the website of the National Sports Council (CSD) only has a generic contact form (not designed to report information related to fraud, bad practices or corruption) and a specific mailbox to report racist acts at sporting events through a simple email.

The CSD must necessarily incorporate a tool available to any citizen that allows to inform facts that could have negative consequences for the sport, which can be easily found on its website, informing of the rights and guarantees that protect the informant and guaranteeing the confidentiality and security of information.

But, on the other hand, the CSD has indeed a complaints mailbox for racist acts in sporting events (noalracismo@csd.gob.es) since 2014, although it is not visible from the main page of its Web portal, it is

necessary to search among the different sections to locate it.

Figure 2 - CSD webpage screenshot



3.2.2 The RFEF website

Focusing on football, at the moment the website of the Royal Spanish Football Federation (RFEF) does not include comparable reporting systems to that of the international association to which it belongs (FIFA). The RFEF web complaint form requires identification of the reporting person and does not have access to information about the recipient, procedure or treatment of the information provided.

This tool does not allow an anonymous report, nor does it break down the actions that are denounced by this channel. Although we have been told that the Compliance department is working to incorporate this option in the coming months.

While it does not contemplate the anonymous complaint, it has a contact telephone number that has the integrity director as a receiver, accessible to all athletes and employees who want to make known the illegality, fraud or bad practices. This mechanism does not allow to encrypt the information or provide documentation without identifying, so we cannot consider it totally

anonymous if we want the reporting person to know the status of the procedure and collaborate with the investigation.

Among the improvements that the Spanish Federation has to make is to separate the structure of the reporting system from the suggestion box, providing the reporting process with greater guarantees:

Figure 3 - RFEF webpage screenshot

The screenshot shows a web page with a sidebar on the left containing a navigation menu with links such as 'ÓRGANOS DIRECTIVOS', 'MARCO NORMATIVO', 'ORGANIZACIÓN INTERNA', 'INFORMACIÓN ECONÓMICA', 'CALIDAD, MEDIOAMBIENTE Y SSI', 'PROCESOS ELECTORALES', 'BUZÓN DE SUGERENCIAS' (highlighted in blue), and 'CANAL DE DENUNCIAS'. The main content area is titled 'Canal de denuncias' and contains fields for 'Nombre y Apellidos', 'Correo', 'Teléfono', 'Ámbito de la denuncia' (with a dropdown menu showing 'Ninguno'), and a large text area for 'Mensaje'. At the bottom right of the message area is a green 'Enviar' (Send) button. The background features a collage of architectural and greenery images.

Figure 4 - RFEF webpage screenshot

The screenshot shows a web page with a sidebar on the left containing a navigation menu with links to various sections such as ÓRGANOS DIRECTIVOS, MARCO NORMATIVO, ORGANIZACIÓN INTERNA, INFORMACIÓN ECONÓMICA, CALIDAD, MEDIOAMBIENTE Y SSL, PROCESOS ELECTORALES, BUZÓN DE SUGERENCIAS, and CANAL DE DENUNCIAS. The CANAL DE DENUNCIAS link is highlighted in blue. The main content area is titled 'Canal de denuncias' and contains a form with fields for 'Nombre y Apellidos', 'Correo', 'Teléfono', and 'Mensaje'. There is also a dropdown menu labeled 'Ámbito de la denuncia' with the option 'Ninguno' selected. At the bottom of the form is a button labeled 'Enviar'. The background of the page features a large image of a stadium and some green grass.

The whistleblowing hotlines or any protected reporting system must be visible from the main page and redirect the user to a secure and confidential channel. This is another failure that the whistleblower hotline facilitated by the RFEF commits, since, if one enters the different sections (suggestion box and complaints channel), it can observe that the structure and composition is the same:

It is not desirable to give the same category, management and security to a suggestion box as to a whistleblower channel.

The structure of the hotline does not contain any of the guarantees required by a system of this type to be effective. On the one hand, it does not protect the confidentiality of the whistleblower, having to disclose the names and surnames, along with their email and even their telephone number. Denatures the objective of the complaints channels, being in practice a simple system of contact with the Federation for citizens. And on the other hand, it does not have a procedure that guarantees the custody and the recipient of this information. Another uncertainty in the eventual complainant occurs when opening the breakdown of the "scope of complaint"; that incorporates the form (competition, tickets, organization, amateur football, women's football, futsal and others), at no time refers to issues related to bad practices such as doping, match-fixing, bribery, conflict of interest or other aspects that require reporting to maintain integrity in the sport.

An informant will hardly be aware of criminal acts or related to bad practices in sport through the system currently offered by the RFEF. Apart from being a platform completely removed from the standards that must have a system of complaints and guarantee to the complainant, it does not bring to the attention of the latter the rights and / or obligations that the denunciation may entail, which results in the provision of

a section called complaints channel, in the sense offered by the RFEF, is inefficient and unproductive, since, having already a suggestion box stipulated and with the same guarantees, they are creating a duplicity of systems that only generate insecurity at the whistleblower and useless reporting systems.

The recent scandals in sport show once again that informants play a vital role in the discovery of irregularities and that, if they don't have the necessary guarantees, they will probably suffer harmful consequences for coming to denounce some facts. The work of the institutions in the implantation and promotion of the whistleblowing channels is key to achieve a good Governance and Compliance, therefore, they have to work in systems that guarantee the confidentiality and security of the whistleblower, ensuring that these channels have been communicated to the possible targets that go to the system, and in turn, training and information campaigns have been carried out in this sense, because, if the informant does not know the consequences or the guarantees that protect him or she, the likelihood of a denunciation occurring is almost non-existent. If we add to these purely objective factors the subjective variables, the efforts to establish and reinforce these systems must be double, because sports, more if we talk about team sports, is loaded with an emotional variable and companionship, to have a moral or social dilemma at the time of reporting for generating a sense of disloyalty if they have to involve a partner. The Spanish culture, as it happens in other European countries, as we have been able to study by the data of our partners (in this and other projects of similar characteristics), has assimilated the non-honesty when it comes to denouncing some facts within its environment labor, because in these countries the "sneak on culture"; predominates as a negative aspect of the person.

The RFEF has a great deal of work to do within these areas, because as the body that directs and manages football in all its specialties, it is the institution in which every sports organization related to football must look and try to follow, within its economic and structural possibilities.

3.2.3 The RFAF website

Websites of the Autonomic Federations were the next to analyze. The RFEF is integrated by the federations of the autonomous community (art 9 Statutes), although the competences (scope of action) correspond to the RFEF (government, administration, management, organization and regulation of football in all its specialties). Following the example of the national, most do not have a complaint box accessible to any citizen. Only the RFAF has a well-established hotline for citizen access.

On the main page of the Andalusian website there is a banner that allows any person to directly access a page (landing) that lets citizens know about the possibility of denouncing some facts and the steps to follow if they proceed to do it. It facilitates an electronic mail (integridad@rfafe.es), managed by an Integrity Commission, for any matter of violence in the football fields, hate crimes and intolerance, protection of minors and corruption and fraud in matches through illegal bets.

Figure 5 - RFAF webpage screenshot

DENÚNCIALO

!!! Denúncialo !!!

La RFAF agiliza el contacto con los ciudadanos que deseen formular denuncias

La RFAF habilita el correo electrónico integridad@rfafe.es en el portal web para las personas que deseen denunciar cualquier asunto contra la violencia en el fútbol.



REAL FEDERACIÓN
ANDALUZA DE FÚTBOL

iDenúncialo!

Escríbenos a integridad@rfafe.es

• COMPORTAMIENTOS INCÍVICOS
• AMAÑO DE PARTIDOS
• GESTOS (POSITIVOS)

La Real Federación Andaluza de Fútbol a través de su Comisión de Integridad que preside Juan Francisco Escobar, ha agilizado el procedimiento para los ciudadanos que deseen denunciar cualquier asunto relacionado con la **violencia** en los campos de fútbol; los **delitos de odio e intolerancia** (racismo, xenofobia, homofobia, sexismo); la falta de **protección a los menores**, así como la **corrupción y el fraude** en los partidos a través de las **apuestas ilegales** en el fútbol aficionado.

El usuario que desee poner en conocimiento de la **RFAF** cualquier asunto relacionado con los asuntos antes referidos, tan sólo tiene que remitir un correo electrónico a la dirección integridad@rfafe.es que estudiará el grupo de trabajo emanado de la Real Federación Andaluza de Fútbol responsable en la materia, en coordinación con la Junta Directiva de la RFAF; los distintos Comités de Disciplinas federativas; la Delegación del Gobierno en Andalucía y los Cuerpos y Fuerzas de Seguridad del Estado.

Although of all sports websites is the most appropriate in the sense of providing a whistleblower channel for citizens, there is still much to implement and improve, because the platform that manages these complaints should not be managed through an email and agrees offer the informant, within the same Web, the rights and obligations that entails issuing a complaint, working on the security and confidentiality of these systems.

Other of the Autonomic Federations to highlight is the Catalonian Football Federation (FCF). It is curious that even with a compliance management system established in their institution, they do not contemplate a channel or reporting system accessible to citizens. It only regulates a whistleblower channel through its Code of Ethics and accessible to internal staff, so it is left out of this study and the end of the project. Whistleblower's hotlines are an indispensable element of a good compliance system and reporting irregularities plays a vital role in achieving good sports governance.

3.2.4 LaLiga website

Another of the organizations analyzed, in terms of reporting systems, has been the Professional Football League (LaLiga), the body that regulates the national professional football championship in Spain (1st and 2nd Division). In this case, this body has been investing for many years on improving practices in football and creating a more sustainable competition from investing in transparency, good governance and management. In this sense, LaLiga, establishes since the 2016-2017 season, as a registration requirement in its competition (regulated in its Statutes, art 55.19), the adoption and execution of organizational, management and control models that include adequate surveillance and control measures to prevent the commission of crimes or reduce the risk of commission.

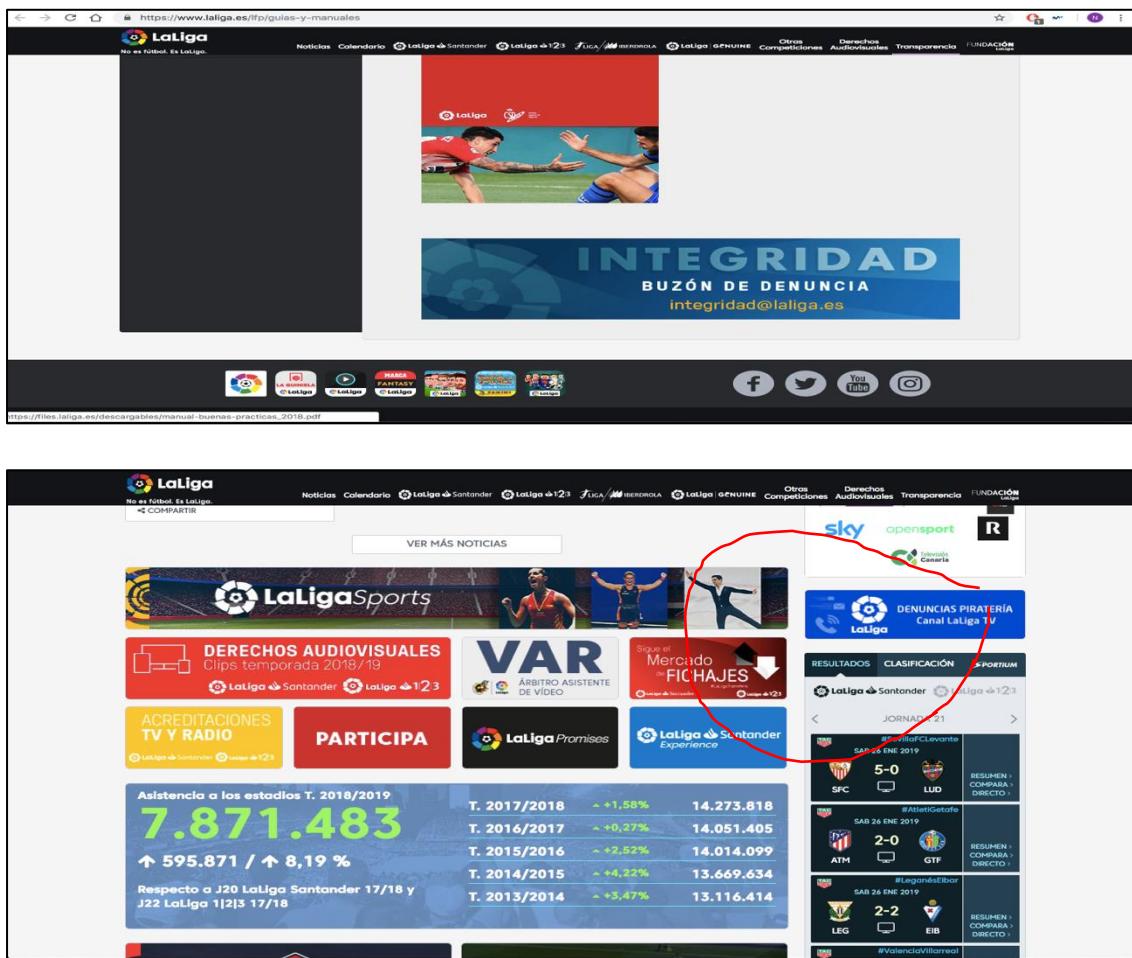
Since the implementation of its Compliance Department in 2015, this organization has made great strides in imbuing clubs with the culture of compliance for which they have bet. Proof of this is the improvement in advertising and accountability of the teams that are attached to the championship. Although LaLiga approves with good practice subjects, transparency and integrity, the reporting channels established in their organization lack the visualization, access and information standards in its Web portal that it maintains in other elements that make up the good governance of its organization.

In the case of La Liga as an institution, it has an integrity channel accessible to the public²¹ to report acts of corruption through an email account and has several manuals on its website (Good Practice Manual, Welcome Manual for Players and technicians, among others) that include a brief description of the use and guarantees of the integrity channel, but it is still incomplete when it comes to reaching the standards that guarantee the protection of the reporting person and inform the protocols and policies of the reporting and investigative procedure. Nonetheless, LaLiga has a visible banner in its home page to report piracy (irregular use of television rights).

The importance of a good tool of reporting systems is vital for the effectiveness of a compliance program, beyond the requirements that regulates the Criminal Code for the prevention of crimes, the whistleblowing channels must be oriented towards good practices in sports, and for this, the system by which the complainant transmits information, which may be of great importance to know about illegal acts that affect the organization, must be easily accessible, visible and ensure the protection of the citizen. It is important that anyone who wants to inform the organization, have access to the rights and duties that may incur when issuing a complaint through that channel.

²¹ It also has an internal ethical channel for employees to report irregular practices.

Figure 6 - LaLiga webpage screenshot



The following analysis focused on a selection of football teams, First and Second Division, which occupied the top 5 in the classification at the time of this consultation (29.01.2019). Following the previous methodology, and basing the analysis on the situation of the complaint channels from the aspects of visualization, access and information provided to the complainant, has been observed five issues that help us to know the implementation of these systems in football teams. The selection of 5 teams from each category has been the starting point of this study that will continue with a more exhaustive and detailed analysis of these teams and the rest of both categories.

The 5 indicators that have been taken into account are:

- **Name of the channel:** Indicates what name the channel is entitled to. It is important for the potential informant to have no confusion when directing their complaint to the organization. Not only does it provide clarity of the appropriate channel to report on facts, but also, it produces confidence in the complainant, making the system more efficient;
- **Landing page:** Indicates if you click on the banner of the channel to redirect you to another web page. The appropriate thing is that the web site where the link is located takes you to

another page, where the tool offered to report some facts that could lead to an investigation is explained in more detail. The insertion of an additional web page, which is only destined to the complaints channel, simplifies the navigation possibilities, avoiding visual distractions in order to guide the user towards the action he / she wanted to carry out. In addition, optimizes certain keywords, improving the presence in the search results;

- **Location** (navigation): This section describes the route that must be carried out on the Web to reach the organization's whistleblower channel²². The longer the path to the whistleblower channel, the less effective this will be, since the online user requires navigation facilities that if they fail to reach their goal in a short time there is a high possibility that they desist from taking it finished;
- **Mailing address:** It is important, for information and access to the citizen, that the email account has a clear name, that does not generate doubts about the specific use of the email address. Complaints are often mixed for certain irregularities in sports with mailboxes of doubts and suggestions. Or in the case of many organizations, the ethical channel is confused with the complaints channel;
- **Guarantees for the whistleblower:** Collect briefly if it announces on the Web, within the section of the whistleblower channel, the guarantees that protect the whistleblower. It is important to have published, in the same web page where the complaints channel is located, all aspects that regulate the status of whistleblower, including the process and the body or bodies that receive and process the information deposited in the channel.

²² In terms of internet marketing, the path a user has to take to complete the conversion (fill out a form or know the user's guarantees) is known as the Conversion Rate Optimization (CRO). If the user experience is bad, because he does not know what he has to do or where to find the information he is looking for, a bad CRO is produced by default. A website with good user experience will have an easy and fast route and increase the percentage of visitors and users.

Figure 7 – Spanish Club's Reporting Channels (Top 5 – First and Second Division)

ORGANISMO INSTITUCIÓN	DENOMINACIÓN DEL CANAL	LANDING DEL CANAL	LOCALIZACIÓN (NAVEGACIÓN)	CORREO	GARANTÍAS PARA EL DENUNCIANTE/COMENTARIOS
CLUBES DE PRIMERA DIVISIÓN (los 5 primeros clasificados a 29.01.2019)					
F.C. BARCELONA	"Canal de Cumplimiento Normativo y Ético"	NO	Club → Transparencia → Relaciones con los socios, aficionados y público en general	compliance@fcbarcelona.cat	No tiene garantías. El canal es para que pongan en conocimiento incumplimientos del C. Ético.
REAL MADRID C.F.	"Canal de Cumplimiento Normativo y Ético"	NO	Club → Transparencia → Relaciones con los socios, aficionados y público en general	cumplimiento@corp.realmadrid.com	No tiene garantías. El canal es para que pongan en conocimiento incumplimientos del C. Ético.
SEVILLA F.C.	"Canal de denuncias"	SI	Club → Transparencia → Relaciones con los socios, aficionados y público en general → canal de denuncias	https://secure.sevillafc.es/denuncias	Tienen garantías mínimas (indica confidencialidad y órgano que recibe la denuncia). El canal es para que pongan en conocimiento incumplimientos del C. Ético.
CLUB ATLETICO DE MADRID	"Canal de denuncias"	No	Club → Código Ético	No se ha podido localizar en la Web	Solo está disponible para personas asociadas con el Club. El canal es para que pongan en conocimiento incumplimientos del C. Ético.
CLUB DE FÚTBOL DEPORTIVO ALAVÉS	"Canal de denuncias"	No	Club → Transparencia → Canal Ético	cumplimiento@alaves.com	No tiene garantías. El canal es para que pongan en conocimiento incumplimientos del C. Ético.

CLUBES DE SEGUNDA DIVISIÓN (los 5 primeros clasificados a 29.01.2019)					
GRANADA CLUB DE FÚTBOL	"Canal de denuncias"	SI	Club → Transparencia → canal de denuncias	canaldenuncias@granadacf.es	Tiene garantías básicas. El mejor posicionado de los estudiados hasta ahora. Describe en un documento aparte el procedimiento que sigue su canal de denuncias.
REAL CLUB DEPORTIVO DE LA CORUÑA	"Canal de denuncias"	No	Club → Transparencia → Canal Ético	Canal.etico@rcdeportivo.es	No tiene garantías. El canal es para que pongan en conocimiento incumplimientos del C. Ético.
CLUB ATLETICO OSASUNA	"Canal de denuncias"	No	Club → Transparencia → Canal Ético	denuncias@osasuna.es	No tiene garantías. El canal es para que pongan en conocimiento incumplimientos del C. Ético.
MALAGA CLUB DE FÚTBOL	"canal de denuncias"	No	Club → Transparencia → Canal Ético	canaletico@malagacf.es	No tiene garantías. El canal es para que pongan en conocimiento incumplimientos del C. Ético.
ALBACETE BALOMPIÉ	No hemos encontrado canal en la Web	No	No hemos localizado el canal		No tiene garantías. Habla de que tiene un programa de Compliance y certificación de la ISO 19601, pero no hemos logrado encontrar el canal en la Web

4. T-PREG partner countries: quantitative and/or qualitative data collection process

4.1 Italian report

The main aim of the report is to introduce in a structured way the use of protected reporting systems in the anti-match fixing policies and actions of sport bodies and institutions. The report includes evidences and information from previous projects, the legal framework regarding reporting system and the necessity and opinions about them according to sportspeople, from grassroots to professional level.

In order to give value to the huge amount of data and information collected in Italy within time, it has been conducted a data collection starting from the evidences emerged during the studies conducted since 2013, implementing them with new data and insights. Below are described the main parts of the data collection.

4.1.1 Evidences and information from previous projects

Since 2013, many information has been collected about the opinions and ideas about match-fixing, according to different sportspeople, from sport authorities and top decision makers, to athletes and sport media.

In each section of this chapter, are reported brief summaries of the main aims of these projects and a series of information or data about match-fixing and whistleblowing useful to complete and improve in-depth the surveys that other partners have done. Specifically, the mentioned projects are:

- a) Stop Match-fixing (2013-2015), in collaboration with the Italian National Football League B;
- b) AntiMatch-Fixing Formula: Understand, Share, Methodize, Replicate" (2015-2016);
- c) AMATT – Anti Match-Fixing Top Training (2018-ongoing).

a) Stop Match-fixing (2013-2015)

The main purpose of this research, done in collaboration with the Italian National Football League B, managed by a cross-disciplinary approach (history, epistemology, anthropology, and psychology), was to understand the match-fixing phenomenon according to Italian football players, to develop a tool to address the issue based on elements that are as objective as possible.

In order to achieve this objective, a national survey was conducted, to provide a first representation of both the main behavioral dynamics in the world of football and the phenomenon of match-fixing in Italy. The survey involved 283 players of the National Football League B, the second national league in Italy.

This survey had the main aim of understand the knowledge and opinions of football players about match-fixing phenomenon, their behaviours and attitudes toward it and their knowledge about protected reporting systems. The sample age had been:

- 14 – 18 years: 43,2%;
- 19 – 25 years 31,7%;
- 26 – 44 years: 25,1%.

Anonymous questionnaire had been sent to 800 football players that played in the Second Italian League (B) via e-mail, and 283 players (35,3% of the population) completed all the questionnaire.

Main evidences had underlined that:

- According to Italian football players match-fixing is present in their sport context but some of them believe they could not be involved in such situations, mainly if they have an agent; they indicate lack of procedures and tools to facilitate the prevention of the phenomenon, and almost half of respondents indicate that improving organizations skills or tools (whistle-blowing or more qualified staff) could be a benefit to combat match-fixing;
- With regard to the perception of the risk of being involved, there is a "split" into those who assume the risk is real and those who ignore it. In particular, those who have a sport agent have a smaller perception of the problem;
- Asked about how they would behave in case of unintentional involvement in illegal acts, a further 50% of the sample indicated that he would not get involved or avoid being implicated. They also indicated that there is a clear lack of procedures and tools to facilitate the prevention of the phenomenon;
- 44% of respondents indicate that improving organizations skills or tools (whistle-blowing or more qualified staff) could be a benefit to combat match-fixing;
- Finally, players believed that in football there were a sort of "antibodies" against illegal matters, but they appeared to be inert. Players understand that the problem concerns them, but they feel distant from it and do not clearly focus on what needs to be done.

Other evidences:

- There is a difficulty in the communication among institutions that should monitor and investigate on illegal flows of money or betting linked to sport;

- In Italy, there are three national Units that work on match-fixing monitoring and investigation (UISS, GISS and GASS), that are recognized as the most important Institutions to prevent and fight against match-fixing practices;
- A possible way to improve the Italian system imply improving the pre-emptive identification of risk scenarios and the timeliness of alert procedures, as well as the ability to target investigative actions in order to strengthen prevention measures;
- Whistleblowing practice is little known, both regarding the awareness of the necessity of whistleblowing processes and possible ways to implement whistleblowing practices into current Institutions dedicated (GASS-GISS-UISS system);
- A possible obstacle to whistleblowing could be represented by a sort of "code of silence" within sport, that imply the necessity to cover or protect the specific culture or people within sport, or the external image of sport;
- There is a strong link between training and education of sportspeople and whistleblowing or the prevention other kind of illegal behaviours in sport, mainly because often people are worry of the lack of protection for them and their families or loved ones against possible negative consequences of their reporting. Understanding the mechanisms of reporting and a better education toward ethical behaviours in sport could lead to improving confidence on whistleblowing and reporting actions;
- It emerges also that sportspeople believe that solutions to match-fixing issue should be proposed only by several institutional inputs, as if the power to act people and groups often cross the background. However, for effective preventive actions the three levels (individual, group and social-institutional) should be thought as strong interconnected.
- The problem has clearly been recognized, representing a historic moment for the world of football worthy of attention;
- With regard to the perception of the risk of being involved, there is a "split" into those who assume the risk is real and those who ignore it. In particular, those who have a sport agent have a smaller perception of the problem;
- Asked about how they would behave in case of unintentional involvement in illegal acts, a further 50% of the sample indicate that he would not get involved or avoid being implicated. They also indicate that there is a clear lack of procedures and tools to facilitate the prevention of the phenomenon;
- 44% of respondents indicate that improving organizations skills or tools (whistleblowing or more qualified staff) could be a benefit to combat match-fixing;
- Finally, players believe that in football there are a sort of "antibodies" against illegal

matters, but they appear to be inert. Players understand that the problem concerns them, but they feel distant from it and do not clearly focus on what needs to be done.

b) Anti Match-Fixing Formula: Understand, Share, Methodize, Replicate (2015-2016)

The qualitative analysis of this project aimed to develop a substantial knowledge about:

- The methods used by organized crime to infiltrate the legal betting industry;
- The spread of match-fixing practices in connection with sport betting.

The analysis had led to create a Synoptic Integrated Frame, a “reference navigation map” to tread on the “challenging terrain” of fixed matches. Data were collected by:

- The analysis of national and international literature and talks from seminars and conferences at a European and international level;
- Interviews and focus-groups with:
 - a) Experts in field at an Italian level;
 - b) Experts in the field at a European and international level.

The main evidences of the outputs of this research had been:

- The construction of a complete map of all the sport actors active in the field of sport integrity, as: Institutions, organizations, Leagues, Clubs, National Olympic Committee, Federations, Associations of athletes- referees and managers, but also Banks and sponsor firms, Betting societies, Monopoly Agencies, Sport and Civil Justice Institution, Legislator, Universities, Non-Governmental Organization or other kind of associations are all at different levels involved in the field of sport integrity;
- The identification of a strong critical element: the communication between relevant channels is often lacking, problematic and not effective. This is a tangible sign that underlying the lack of connection and fragmentation processes that try to combat match-fixing in Italy;
- The identification of some resources: a key element in contrasting match-fixing hinges on giving more power to those existing systems which allow to detect abnormal betting flows or check information on suspects to later supply them to police forces or authorities operating at national level. There clearly is a need to protect sport by strengthening such tools as UISS, the CONI, the Customs and Excise Agency, and FIGC, as well as two ministry-appointed experts.

c) AMATT – Anti Match-Fixing Top Training (2018)

The rationale of this project had been searching effectiveness in anti-Match-Fixing policies implemented by sport organizations through the following process:

- Better understanding before training;
- Investing in designing tailored training and avoid generic training;
- Implementing tailored training to football organizations top decision-makers and to media operator;
- Sharing at EU level the model patterns which will gradually be piloted and fine-tuned.

Data were collected by interviews and focus-group involving 31 participants from multi-sport associations, sport leagues, sport media operators, sport institutions, governmental and non-governmental institutions and athletes. Interviews and focus groups aimed at obtaining:

- a definition from of match-fixing;
- opinions about actors, causes, consequences and possible remedies against match-fixing;
- exploratory questions to understand if there were the possibility to set up whistleblowing processes.

A key issue seems to be the lack of education toward sport values of sport actors, like families, coaches and technicians (i.e., referees, doctors and staff members), but also managers, members of Federal Council and delegates of Sport institutions, that seems to create an entire organized “system of fraud” that sustain the fixing practice and many other non-sporting behaviours. Raising awareness toward illegal behaviours and their consequence are necessary at all levels of sport and no longer postponed in order to reach a future change in sport.

Regarding possible reactions to illegal behaviours, sport people engaged in data collection mainly state they would talk with a member inside their club/association and just a fewer number of them would report to competent authorities. Such “code of silence” seems to be a peculiarity of sport system and represent a clear obstacle to whistle-blowing practices. Therefore, it would be necessary to combat such attitudes in sportspeople, in example by raising awareness, educate and train them to sport integrity and sport values.

Moreover, there's still a general lack of a basic comprehension of what a whistle-blowing system actually means, as many sports actors consider whistleblowing as a danger practice that can lead to personal

problems and sometimes, they perceive a certain sense of impunity and structural corruption within the world of sport. All these facts imply a double necessity: from one side there should be a secure and confidential complaint channels to guarantee trust access mechanisms, and on the other side there should be a clear explanation of how the protocols work and how it protects the identity of the whistle-blower.

In terms of training, this may introduce some thorny questions:

- among sport people is there a “real” lack of awareness on how to behave in case of match-fixing knowledge?
- Is there a “code of silence” issue aimed to an internal management of Match-Fixing?
- why there’s a general worry that a self-exposure could lead to a stigmatization?

Both from the interviews and the questionnaires, even if a lack of sanctions is recognized, prevention and education are considered the key element in the fight against match-fixing. Moreover, according with the results of data collection, it's necessary not only to train on how to handle a possible Match-Fixing situation but also to work on integrity and on the protections of sport and personal value.

However, so far, training programs are still too fragmented without an effective and efficient data and perspective sharing process. It means that we still need to engage all the actors involved to develop a strong network to enable a strategic and coordinated response to match-fixing.

In terms of training the fact that sports people are loudly asking for programs oriented in terms of awareness, support and protection could represent the starting point to work in the right direction.

It's important to underline that, in general, what emerges is a strong reference to the macro dimension in the proposal of solutions and the expectation of possible actions only starting from an institutional kind of input. It is as if the potential for action of people and groups often cross the background. However, for effective preventive actions the three levels (individual, group and social-institutional) should be thought as strong interconnected.

In summary, next to many necessary improvements in terms of education and training toward reporting about illegal fixing in sport, Italy is well-equipped with a clear structure and tools to face match-fixing (i.e., observers, central department, information unit, investigative unit, international relationships with Interpol and Europol). Particularly worthy of note is certainly the coordination system between the various actors involved in the fight against match-fixing. Nevertheless, many actions should be implemented to increase the confidence in whistle-blowing practices, in terms of training and educations of sports-actors at all levels (from grassroots sport to elite and top-decision makers).

Overall considerations

Below are some general considerations that emerged from a transversal analysis of the projects presented above and which may be points of interest in the implementation of our T-PREG project.

- According to Italian football players the issue of match-fixing is present in the sport context but some of them believe they could not be involved in such situations, mainly if they have an agent; they indicate lack of procedures and tools to facilitate the prevention of the phenomenon, and almost half of respondents indicate that improving organizations skills or tools (whistle-blowing or more qualified staff) could be a benefit to combat match-fixing;
- There is a lack - or a difficulty - in communication between institutions that should monitor and investigate on illegal flows of money or betting linked to sport;
- In Italy there are three national Units that work on it (UISS, GISS and GASS), that are recognized as the most important Institutions to prevent and fight against match-fixing practices;
- The mentioned three Units are based on a private-public cooperation, which represents a specific Italian best-practice in match-fixing fighting;
- Considering the existence of different Units with different skills and competencies on illegal betting and match-fixing, one of the possible ways to integrate their work could be to set a system of whistleblowing within them, also to improve communication and coordination between them;
- A possible way to improve the Italian system would imply improving the pre-emptive identification of risk scenarios and the timeliness of alert procedures, as well as the ability to target investigative actions in order to strengthen prevention measures;
- Whistleblowing practice is little known, both regarding the awareness of the necessity of whistleblowing processes and possible ways to implement whistleblowing practices into current Institutions dedicated (GASS-GISS-UISS system);
- A possible obstacle to whistleblowing practice establishment could be represented by a sort of "code of silence" within sport, that imply the necessity to cover or protect the specific culture or people within sport, or the external image of sport;
- Data show a strong link between training and education of sportspeople and whistleblowing or the prevention other kind of illegal behaviors in sport, mainly because often people are worry of the lack of protection for them and their families or loved ones against possible negative consequences of their reporting. Understanding the mechanisms of reporting and a better education toward ethical behaviors in sport could lead to improving confidence on whistleblowing and reporting actions;

- It emerges also that sportspeople believe that solutions to match-fixing issue should be proposed only by several institutional inputs. However, for effective preventive actions the three levels (individual, group and social-institutional) should be thought as strong interconnected;
- Italy is well-equipped with a clear institutional structure to fight match-fixing (i.e., observers, central department, information unit, investigative unit, international relationships with Interpol and Europol). Nevertheless, many actions should be implemented to increase the confidence in whistleblowing practices, especially in terms of training and educations of sports-actors at all levels (from grassroots sport to elite and top-decision makers).

4.1.2 Desk research on Italian legal framework

Another desk research has been conducted in order to describe as detailed as possible the Italian legal framework.

Following an historical frame, it's possible to date the engage of Italy in combat match-fixing in '90 years. As a result of major football scandals that rocked Italian football in 1980 and 1986, Italy has set up a specific regulatory framework focused on sports to combat the problem of manipulation of sporting competitions, known as match-fixing, through the introduction of the crime of fraud in sporting events under article 1 of Italian Law no. 401 dated 13 December 1989.

To do this, a detailed exploration of their current national laws and regulations about protected reporting systems in the Country has been conducted, obtaining the following information:

- **Law 401/89** introduced for the first time the fraud of betting in sporting event;
- In **2011**, it has been established the mentioned system of collaboration among investigating and reporting betting Units, that involves UISS (Sport Betting Information Unit under the Department for Public Security) and GISS (Sport Betting Investigative Unit under the Criminal Analysis Service), and is coordinated by the GASS (the public Coordinator under the Custom and Excies Agency)²³
- **179/2017** it has been published the first law for the protection of whistle-blowers.

²³ Regarding to art. 24, par. 29 to 31 of Italian Law Decree no. 98/2011 converted into law no. 111 on 15 July 2011, many respondents suggest an implementation of the block of financial flows between illegal operators and consumers". Even if the law forces banks that receive an income from a bet win to identify the payer, such obligation is still not respected. According to the interviewees there is a need to broaden somewhat the range of collaborations, including against risks and activities derived from match-fixing".

Even if in Italy the current law on illegal betting has been updated, the aspect that still need to be faced regards the great disproportion in penalties if compared with the gravity and the extent of the problem. Moreover, during these two last years, two budget acts have allowed a procedure known as "emergence", legalizing the collection of previously unauthorized shops. Many respondents are asking "if such measures have had an effect and to what extent".

In summary, despite possible improvements, Italy is well-equipped with a clear structure and tools to face illegal betting and match-fixing (i.e., observers, central department, information unit, investigative unit, international relationships with Interpol and Europol), and not all foreign countries are so advanced. Particularly worthy of note is certainly the coordination system between the various actors involved in the fight against match-fixing.

Focus: Law no. 401 of 13 December 1989

Article 1 The introduction of the crime of *sports fraud*, whether coupled with gambling and betting, fills a regulatory gap that entailed the difficult application of the crime of fraud under article 640 of the Italian Criminal Code to sanction conduct typical of sports fraud, with obvious practical problems related to this specific type of offence. Presumably due to an awareness of a growing problem, the repressive context of fraudulent conduct in sporting competitions under art.⁹ 1 of Italian Law 401/89 was recently strengthened by the tightening of criminal and administrative sanctions as per art.⁹ 1, of Italian law decree no. 119 of 22/08/2014, converted into law by Law no. 146 of 17/10/2014. By setting a punishment that provides for a maximum greater than five years, the change of 2014 allows monitoring of communications during the investigation and in theory allows the application of all coercive measures.

Purpose of Italian Law 401/89. The purpose for introducing the crime of *sports fraud* was twofold: to ensure fairness and propriety in the conduct of sporting competitions in the public interest, and secondly to prevent the phenomenon of illegal betting by countering illegal gambling and betting.

Offenders in the crime of sports fraud. In the crime of *sports fraud*, the status of "offender" was interpreted broadly: whether athletes or club executives, whether sports fan or any person external to the world of sport.

Behaviour and definition of the crime. The crime of *sports fraud* is defined as "*a dangerous crime that is committed at the time and place where there is the promise or offering of an undue advantage or the commission of any other fraudulent conduct and not at the time of the acceptance of that promise or offer*". There could be two behaviours under the law: "*the offer (or promise) of money or other benefit or advantage*" and "*the performance of other fraudulent acts, namely generic fraud in order to cover every possible behaviour aimed at alteration of the rules of fair athletic competition*".

Other fraudulent acts. Considering the variety of behaviours aimed at the alteration of competitions, the law-making authority attributed criminal implications also to other "*fraudulent acts*" aimed at altering the results of competitions. In example, the assignment of the referees, in order to facilitate the participation of referees considered more favorable to the club in its matches.

Relationships with sports rules. Sport has established an actual system of rules that applies sanctions to *sports fraud* like the alteration of a match in its outcome or its conduct (FIGC Sports Justice Code).

4.1.3 Implementation of qualitative data collection

The qualitative part of the research conducted in T-PREG implies interviews or/and focus groups with target group by each partner Country, with the aim to understand the level of knowledge, different opinions and the eventual necessity of protected reporting systems according different stakeholders, from top decision makers, to grassroots sportspeople and athletes. The sample involved in data collection has been the following:

Table 7 - Sports actors interviewed

N. of participants	Institution	Sport
31	<ul style="list-style-type: none"> • Multi-Sport Associations – n.1 • Sport Leagues – n.1 • Sport Media – n.4 • Sport Institutions – n.8 • Gubernative and non-governative Institutions – n.9 • Athletes – n. 8 (6 football players and 2 wheelchair basket/bask-in athletes). 	<ul style="list-style-type: none"> • Football • Wheelchair basket • Equestrian sports • Handball • Running • Cricket

Data were collected by 6 interviews and 4 focus-group involving 31 participants from multi-sport associations, sport leagues, sport media operators, sport institutions, gubernative and non-governative institutions and athletes. Interviews and focus groups aimed at obtaining: a definition of match-fixing, opinions about actors involved in match-fixing cases, causes and consequences, and possible remedies to combat match-fixing and the knowledge of current whistleblowing systems.

Interviews to Italian experts and football players in the field of match-fixing covered mainly the following areas: opinions, definitions, causes about match-fixing, actors involved and their role, actions at national level that have been carried out to prevent and combat match-fixing (i.e., special task forces that deal with monitoring and investigating on it), and possible future development.

Regarding causes and opinions of the phenomenon, football players interviews were richer and mainly agree with the expert's point of view. Therefore, we decide to focalize in this first section on the experts' interviews main findings, and in the second part on the players' answers.

Regarding causes of match-fixing, football players specifically indicates money (and their lack) as the main cause of illegal betting from players, in particular for players which play in low level Leagues or in Society that have financial problems. Experts mainly agree with that point of view. Moreover, they affirm that match-fixing involves low-risk, highly profitable illegal activities entailing corruption, fraud and money laundering, which are difficult to monitor considering the different betting options currently present and imply a kind of premeditation. Actors involved can be sum up them in the following list:

- Match-fixing is an organized illegal system involving multiple subjects, with a widespread and far-reaching network;
- Fixers could stay inside and/or outside the legal system, and it's hard to define and identify them;
- Often victims are unknowing of their actions' implications.

Interviews reveal the massive proportions of the match-fixing phenomenon and the difficulty in defining it. A possible definition created by the words of interviewees could be the following: "match-fixing is a national and transnational sport fraud, at once very widespread and difficult to control. It is targeted at selecting and manipulating specific sport events in order to ensure that – thanks to the predetermination of partial and/or final results – by placing a bet (on either a legal or an illegal network), on that specific event, the accomplishment of significant, mostly financial, advantages at a relatively low risk is guaranteed".

New results

A key issue regarding causes of match-fixing seems to be the lack of education on sport values of sport actors - like families, coaches and technicians (i.e., referees, doctors and staff members), managers, members of Federal Council and delegates of Sport institutions -, that allows the creation of an organized "system of fraud" that sustain the fixing practice and many other non-sporting behaviours. Raising awareness among them about illegal behaviours and their consequences are necessary at all levels of sport and cannot be longer postponed to reach a future change in sport. Nevertheless, there is a general lack of awareness toward match fixing issue at grassroots level, as the majority of problems are linked to other kind of ethic phenomenon, like, pedo-pornography, bullying and other kinds of immoral acts.

Regarding possible reactions in case of direct or indirect involvement in illegal behaviours, sportspeople mainly state they would talk with a person inside their club/association while fewer would report to competent authorities. Such mentioned "code of silence" seems to be a peculiarity of sport system and represent a clear obstacle to whistle-blowing practices. Therefore, it appears necessary to combat such attitudes by raising awareness, educate and train them to sport integrity and sport values.

Moreover, there's still a general lack of a basic comprehension of what a whistle-blowing system actually means, as many sports actors consider whistleblowing as a practice that can lead to personal problems, nevertheless they perceive a sense of impunity and structural corruption within the world of sport. All these facts imply a double necessity: from one side there should be a secure and confidential complaint channels to guarantee trust access mechanisms, and on the other side there should be a clear explanation of how the protocols work and how it protects the identity of the whistle-blower.

In terms of training, this may introduce some reflections:

- among sport people there's a “real” lack of awareness on how to behave in case of match-fixing knowledge;
- there's a “code of silence” issue aimed to an internal management of match-fixing;
- there's a general worry that a self-exposure could lead to a stigmatization.

From the data it emerges that even if a lack of an adequate punishment is recognized, and that prevention and education are considered key element in the fight against match-Fixing. Moreover, it's necessary not only to train on how to handle a possible match-Fixing situation but also on integrity and on the protection of sport and personal values. It means that it is still needed to engage sport actors at all levels to develop a strong network to enable a strategic and coordinated response to match-fixing.

In terms of training the fact that sports people are loudly asking for programs of awareness, support and protection against match-fixing represent a starting point. In terms of training this could be translated in the following issues:

- why do sport people perceive a lack/need of actions aimed to promote awareness and integrity assumption?
- does it mean that current policies aren't properly promoted and shared?
- does it mean that current polices do not fit properly sport inner dynamics? Which dynamics are perceived as the most relevant/tricky ones?
- does it mean that policies aren't enough coherent with sport everyday life? if so, which could be a contact point?
- is there any kind of awareness about current polices weaknesses and values?

It's important to underline that it is emerged a strong reference to the macro/Institutional level in the proposal of solutions and the expectation that possible actions can only be managed by an institutional input. It is as if the potential for action of people and groups cannot be enough and often cross the background. However, for effective preventive actions the three levels (individual, group and social-institutional) should be thought as strong interconnected.

In summary, next to many necessary improvements in terms of education and training toward reporting about illegal fixing in sport, Italy is well-equipped with a clear structure and tools to face match-fixing (i.e., observers, central department, information unit, investigative unit, international relationships with Interpol and Europol). Particularly worthy of note is certainly the coordination system between the various actors involved in the fight against match-fixing. Nevertheless, many actions should be implemented

to increase the confidence in whistle-blowing practices, in terms of training and educations of sports-actors at all levels (from grassroots sport to elite and top-decision makers).

About GISS

From the interviewees word it's possible to understand that there are several issues related to communication between the Institutions involved in the fight against match-fixing. Communication critical issues have been identified:

- Among sports Institutions, specifically between federal sport prosecutors and ordinary court, which has the responsibility to investigate in match-fixing cases and at the end of the investigations can transmit the information gained to the federal prosecutor, that have the responsibility to judge people implicated and punish them;
- Between sports prosecutors and state prosecutors, that concerns mainly the fact that there are some differences between ordinary and sport justice as in the field of sports justice the rules for gathering evidence are simplified and less complex;
- Among monitoring agencies, as there are different agencies that monitor financial and economic issues in football that often hold different parameters of strictness (i.e., Supervisory Commission on Professional Football Clubs - COVISOC controls the financial statements of professional sports clubs while National Commission for Companies and the Stock Exchange - CONSOB do the same work for clubs listed on the stock exchange);
- Between monitoring agencies, sports justice and state justice. According to the Italian Penal Code an "evidence" is "a proof of the existence of certain legal facts, even by demonstrating the existence of other facts from which we can infer the existence of those we are seeking to prove". In this sense, it often happens that monitoring companies produce results that can have a prognostic but not "factual" value and therefore there are some misunderstanding about the same fact;
- Among various national and international police forces, that is due mainly to the fact that the Penal Codes of each states are not harmonized with each other and accepting "evidences" from abroad could be difficult from state to state;
- Between authorities directly involved in counter-match-fixing activities and the business world is currently present a form of collaboration, but companies feel to strengthen this link;

- Between national and international actors, since there is still a lack of coordination at an international level both of authorities and federations and a lack of attention and cooperation between foreign institutions or foreign and national judicial authorities;
- Public communication/media: the delicate task of media should be to promote and increase awareness about the phenomenon, helping public opinion to form a right opinion about it, reducing the risk of criminalizing the phenomenon and the risk of "generalizing the evil" that could mean, paradoxically to legitimate it (i.e., "Everybody's stealing so I do it too! What's wrong with that?").

To improve/strengthen this coordination mechanism, it will be necessary to:

- Improve the quality and quantity of shared information;
- Improve the pre-emptive identification of risk situations and fasten the alert procedures, as well as the ability to target investigative actions in order to strengthen prevention measures;
- Encourage a rapid feedback to the licensed operators to exchange information and actions to be done;
- Compared to companies operating in the sector, only 60-65% of bets are monitored by the Customs and Excise Agency. Therefore, improve the monitoring of the betting operators would be necessary;
- Inform officials about the investigation and avoid the confidentiality of investigations;
- Improve feedback from the operators, as they are not always immediate.

4.2 Spanish report

Attending to the different Phases of the T-PREG Project, we have come to report on the first of them, which aims to analyze the protected reporting systems in the field of national sports for a specific discipline, in this case, football. For this, some surveys have been carried out, both qualitative and quantitative, which have allowed to collect enough data to analyze and obtain conclusions at a national level, at the same time that they will be shared and compared at European level with the partners of the Project.

4.2.1 Legal status of reporting systems in Europe and Spain

Probably many of the recent fraud and corruption scandals²⁴ would have never been exposed if workers from those organizations or other interested parties had not had the courage to communicate them. However, being able to offer a secure system for employees, third parties or other interested parties to report possible fraud, irregularities or unethical behavior without receiving any kind of unfair reprisal is something that apparently has not worried much the European legislator or the Spanish legislator, until very recently.

Regarding the European regulatory environment, it has been the EC that has initiated the path towards a normative unification of the currently fragmented and insufficient protection of whistleblowers in the countries of the EU, through the proposal for a New Directive (23.4.2018)²⁵ for the protection of all whistleblowers, reporting any possible corrupt, fraudulent or contravening EU laws; all this through the establishment of secure hotlines of notification and reporting of violations of community law with full guarantees against possible reprisals for whistleblowers of corruption, fraud or other irregularities in both private companies and public bodies (In particular, all companies with more than 50 employees or with an annual turnover of more than 10 million euros must establish an internal and safe procedure to report or inform any irregularity and, for their part, all state and local administrations regional and municipalities with more than 10,000 inhabitants will also have the obligation to establish it) and it also provides protection for journalists who publish their investigations and complaints in good faith.

In fact, already in 2017, the EC published a report that was crucial: "Estimating the economic benefits of whistleblower protection in public procurement"²⁶, in which the EC showed that the potential gains from the recovery of diverted public funds exceeded by much the costs of establishing and maintaining such secure protected-complaint systems, especially in the area of public procurement; along with other strong economic arguments for the protection of whistleblowers and the establishment of secure whistleblowing channels.

²⁴ Just as Panama Papers, Luxleaks, Cambridge Analytica, Gürtel, Púnica, Acuamed, Palau, etc.

²⁵ <https://eur-lex.europa.eu/legal-content/ES/TXT/?uri=CELEX%3A52018PC0218>

²⁶ <https://publications.europa.eu/es/publication-detail/-/publication/8d5955bd-9378-11e7-b92d-01aa75ed71a1>

Everything indicates that the Directive is not only going to finally prosper, but also that the Legal Affairs Committee has made a series of amendments that improve the subjective protective scope of the proposal and opening even the objective scope of the complaints to other areas such as: tax evasion and tax avoidance, environment protection, public health and safety or gender equity and gender equality.

Regarding the legal situation in Spain on protected reporting systems, it should be noted that today they are regulated in the recently published Spanish Law on Data Protection in its article 24, which also admits anonymity, a figure that was coming rejecting by various sectors of the doctrine and even by the Spanish Agency for Data Protection. Likewise, in terms of prevention of money laundering the new Royal Decree-law 11/2018, of August 31, also regulate them; and the general regulation, now obsolete and insufficient, can be found in article 259 and following of the Law of Criminal Procedure. However, nowadays, there is no specific law on the protection of whistleblowers in Spain, unlike other legal systems.

In relation to agencies or organisms that receive complaints, reports or information, although there is no single institutional body commissioned to receive this type of notification, there are agencies that have implemented this type of system, for example, the National Commission of Markets and Competition (CNMC), the National Securities Market Commission (CNMV), the Executive Service of the Commission for the Prevention of Money Laundering and Monetary Offenses (SEPBLAC), the Tax Agency (TA) or regional bodies such as the Antifraud Office of Catalonia or some city halls.

Likewise, although companies are not yet obliged by law to establish a secure system of complaints and notifications, within the framework of Article 31 bis of the Spanish Criminal Code, those legal persons (including private and public companies, unions, organizations, political parties, etc.) who want to benefit from mitigating or even exempting criminal liability for having established organizational and management models for prevention, detection and reaction of inappropriate behavior will have to inform of possible risks and non-compliance to the body in charge of monitoring the operation and observance of the model of prevention (31 bis 5. 4th CP), what the majority of the doctrine has been interpreting, *ab alieno iure imitatione*, as the existence of a whistleblowing reporting system in the compliance programs²⁷; what in practice has led to practically all large companies have this type of system, especially those that are listed companies. While it is true that as a consequence of such legislative vagueness and in the absence of clear

²⁷ For example, the Office of the Attorney General of the State, which in its CIRCULAR 1/2016, ON THE CRIMINAL LIABILITY OF LEGAL PERSONS PURSUANT TO THE REFORM OF THE CRIMINAL CODE MADE BY ORGANIC LAW 1/2015, expressly states: "The existence of channels of Reporting of internal breaches or illicit activities of the company is one of the key elements of prevention models. However, in order for the obligation imposed on employees to be required, it is essential for the entity to have whistleblower-specific protective regulations that allow for the reporting of various breaches, facilitating confidentiality through systems that guarantee this in communications (telephone calls, emails ...) without risk of reprisals";(App 5.3, p 45).

and uniform standards, not all organizations are aware of the minimum requirements that a secure reporting system must possess in order to be effective, safe and without risk to suffer retaliation by whoever uses it.

Finally, the Proposal of the Comprehensive Law to Combat Corruption and Protection of Whistleblowers²⁸, presented on September 15, 2016, which does foresee the establishment of this type of systems and the protection of whistleblowers, according to the Congress of Deputies the Proposal is still in the process of being processed, however, the *Ponencia* phase has not yet been called, an essential stage for the Proposal to be debated, voted on and, if necessary, approved and sent to the Senate.

4.2.2 Legal status of reporting systems on sport and specially on football

As we have analyzed in the previous section, the existing legislation and regulation of complaint channels in Spain for the prevention and detection of illegal, ethical or contrary practices to business practices is quite scarce and often inefficient.

If we focus on the world of sports, the last decades reflect a systematized corruption that needs to be fought through different mechanisms, starting with the involvement of its international and national organizations, which need better Governance to prevent and detect corruption. This sector, in comparison with others of economic activity, is built around some particularities that need to be known in order to achieve an efficient use of the tools that allow introducing good practices in the development of their activities, and progressively generate a culture of compliance in the sports field.

When investigating which systems and procedures are adequate to report irregularities in sport, the particularities that we comment should be taken into account, since the profile of the complainant varies greatly depending on his / her role in sport and the sport's discipline that belongs. These issues must be taken into account when building a framework of protection for the athlete, and for the other agents involved in the development of the sport, since the more ad hoc - or specific and tailored - the complaint system is and protection to whistleblowers, more efficient and productive will be.

In this sense, each sports entity must establish a clear and detailed policy of the reporting channels and the set of procedures that assist them, advising and communicating the athletes, and the different members of the different sports institutions of the existence and protection the informant through these means. The greater the clarity and practicality of such reporting instruments, the greater the success. But, to create an effective and safe reporting system that helps to tackle bad practices, the involvement and will of all sporting bodies is required, from the international to the national level, through all sports bodies, national

²⁸[http://www.congreso.es/portal/page/portal/Congreso/Congreso/Iniciativas?_piref73_2148295_73_1335437_1335437.next_page=/wc/servidorCGI&CMD=VERLST&BASE=IW12&FMT=INITDSS\(fmt&DOCS=1-1&DOCORDER=FIFO&QUERY=%28122%2F000022*.NDOC.%29](http://www.congreso.es/portal/page/portal/Congreso/Congreso/Iniciativas?_piref73_2148295_73_1335437_1335437.next_page=/wc/servidorCGI&CMD=VERLST&BASE=IW12&FMT=INITDSS(fmt&DOCS=1-1&DOCORDER=FIFO&QUERY=%28122%2F000022*.NDOC.%29)

leagues, individual clubs that they manage to create and coordinate a proactive culture of integrity and compliance.

In the sports field, the concern of an informant may arise not only regarding match-fixing, but also in other forms of corruption and fraud: doping, conflict of interest, bribery, discrimination, physical or sexual abuse, etc.

In recent years, reporting systems and protection in sport have left much to be desired. Although the international sports organizations (JJ.OO., FIFA, UEFA, International Association of Athletics Federations - IAAF, IOC, etc.) have improved in the implementation, communication and training of their employees and federated in questions of whistleblowing and whistleblower's protection, efficiency of these systems has not been reflected, the failures in the mechanisms of protection to the informants that have been known around these institutions are patent. One of the most known recent cases was concerning a high-profile informant (Phaedra Al Majid), who reports a corruption case regarding the election of Qatar for the World Cup. The informant herself later stated that the guarantees of confidentiality given to her were violated and her security compromised²⁹. Another recent scandal was the complaint of the former Director of the Anti-Doping Laboratory in Russia (Grigory Rodchenkov)³⁰ whose information was critical to uncover the institutional doping of the Russian state, and he said that FIFA ignored him when he brought to them information involving Russian players. Jack Robertson³¹, former chief investigative officer for the World Anti-Doping Agency, also accused the IOC of failing to protect whistleblowers and disregarding information obtained through such allegations.

Although in the international sporting context there seems to be no effective whistleblower protection policies or complaint systems that guarantee their safety and confidentiality, certain national institutions have done a good job in this regard.

Taking into account these and other aspects, as well as our experience accumulated by the investigations carried out in other projects of similar subject and targets, for this project we decided to focus the study on a single sport discipline, in order to focus its previous research and subsequent implementation practice in a more specific way, attending to the needs required by certain institutions and interest groups, in this case, the chosen sport discipline was football.

Football is the sport with the most federated individuals in Spain³², in 2017 it held 1,027,907 licenses of the total of 3,761,498 that accumulate all sports disciplines in Spain. As it has 21,148 clubs registered in the Register of Sports Associations, in comparison of the 67,030 that exist among all other federated sports.

²⁹ The Guardian, 16 de diciembre 2014.

³⁰ https://www.elconfidencial.com/deportes/2018-01-03/dopaje-rusia-comite-olimpico-fifa-rodchenkov_1500078/

³¹ <https://www.nytimes.com/2017/12/27/opinion/2018-winter-olympics-russia.html>

³² http://www.csd.gob.es/csd/estaticos/asoc-fed/licencias_y_clubes_2017.pdf

So, the scope of extension of federated practice was one of the reasons for choosing this discipline for the Project and also for the number of fans and the volume of economic activity that it generates. On the other hand, we have taken into account the ease of access and obtaining the data we needed to develop this study and the most important factor, we have had full availability and collaboration from the start with the various sports institutions related to the football with which we have contacted for this project.

At first, our first approach to get the data and the implication that we needed in this project, was to contact the RFEF to work closely with us in certain aspects of the investigation. The election of the RFEF was not an arbitrary choice, as it is a private association of public utility that is made up of the Autonomic Federations and their clubs, the players, the referees, the coaches and the National Professional Football League. Leaders and natural or legal persons or entities that promote, practice or contribute to the development of the sport of football are also part of the federative organization. By covering relationships with all institutions and bodies of this discipline allowed us to contact profiles with different background and characteristics, giving us the points on which to focus the study and address the objectives of this project.

As a first stage of the investigation, once the legal scenario was analyzed, our objective was to conduct a STUDY OF THE CURRENT SITUATION OF THE REPOTING SYSTEMS IN THE DIFFERENT FOOTBALL BODIES, analyzing their visualization, access and information prepared for the complainants that are exposed in its web portals and is public access for any citizen or relevant stakeholder. The information obtained was presented in detail in section 3.2.

4.2.3 Research and field work: data collection

The data collection, as the European program marks, is carried out from two aspects: quantitative and qualitative.

The qualitative data was obtained through 15 personal interviews with some of the most decisive interest groups in the sport. In order to obtain significant data and draw the necessary conclusions, the RFEF contacted different agencies, providing us with the appropriate targets for the study.

The meetings were held in different blocks, according to the role in sport that the interviewees had:

- Meeting with the Coaches Committee (CC) ➔ They helped us to carry out 5 interviews with referees of the different professional categories, achieving a sample that included coaches of 2nd, 2nd B and 3rd Division. Thus, we achieved a sample of professional and amateur football.
- Meeting with the Referees Committee (RC) ➔ The RC gave us interviews with 5 referees who have carried out their activity in professional and amateur categories.

- Meeting with 5 players ➔ to get the meeting with the players we got in touch with the Spanish Footballers Association (AFE³³), Once we told them about the project we are carrying out, they offered to be able to continue cooperating with us in the following phases of the project, also for the training of their employees or affiliates. The interviews also had football players of the professional field (male and female football) and amateur (male).

Although the interviews were conducted in a personal and individual way, it was detected that each group (players, coaches, referees and senior management staff) has common personal and professional factors that led to certain questions maintaining a homogeneous line in their responses. This allows us to observe that when drawing conclusions from the data obtained, we must bear in mind, apart from the social and personal characteristics of the interviewees, the ethical and sporting values that coexist within each of these differentiated groups.

To carry out the collection of quantitative data, surveys have been prepared, adapted to the needs of the territory where the research is carried out and approved by the coordination of the program. For the distribution of the surveys, we have counted on the essential collaboration of the RFEF, through a digital platform available to all its members.

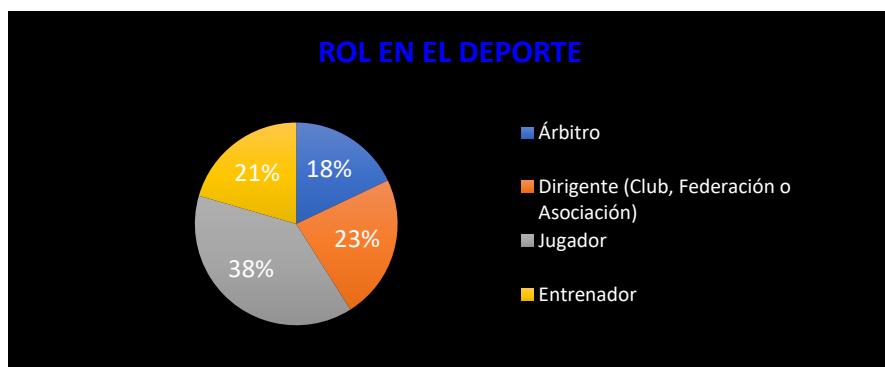
In the quantitative analysis, a single survey has been prepared for the different groups interviewed, with some specific questions for some of them.

For its dissemination, a news about the survey was published on the RFEF website and an internal Circular was issued to communicate, to all the territorial federations, the participation of the Federation in this project and request the collaboration of the clubs and other institutions related to the RFEF, such as the RC or the CC.

At this time, 39 surveys have been gathered, which, as we see in the following graph, represent the participation of the different groups analyzed (21%, 18%, 38% and 23%). This will give us results that will include the opinions of all the players in the sport, which will allow us to obtain conclusions that are useful for all of them.

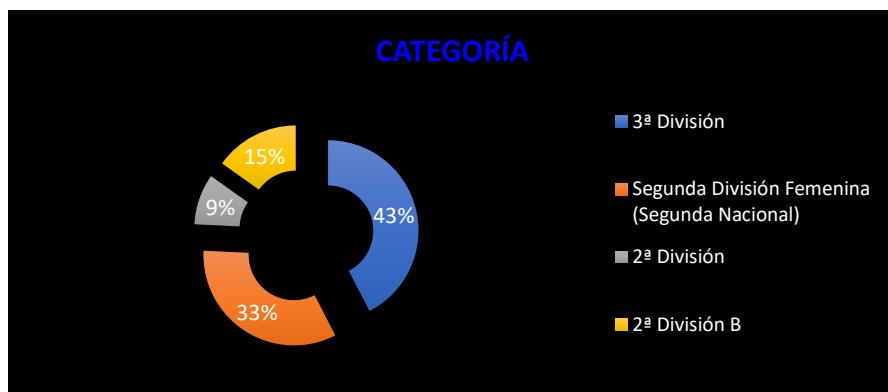
³³ AFE is the organization that defends the professional interests of footballers, guiding, advising and defending in everything that concerns their sporting activity, and where appropriate, professional (You can check the AFE Website at <http://www.afe-futbol.com/web/>)

Figure 8 - Role in Sport



It is important, for the data analysis and the conclusions, the category to which the respondents belong, since these determine specific characteristics that affect the professionals surveyed (economic factors, professional expectations, experience, etc.).

Figure 9 – Division in Sport



Although the average age of the respondents is 34 years, which could indicate that we are dealing with professionals with a lot of experience, we have to take into account that the managers who have carried out the surveys (23% of the respondents) have more than 40 years, which means that age can be misleading but we appreciate that we are analyzing targets with very different professional age margins (managers, coaches, referees and players). By contrast, if we look at the respondents under 25, most of whom have not yet matured professionally, we have 23% of respondents. These differences are very important for training purposes, since those of younger age usually belong to categories where the salary is not very high, which together with their little experience, makes them targets of match-fixing risks. On the other hand, the percentage of managers shows us that we have to take into account the data analyzed and use the information obtained for the specific training of managers, which requires tactics and methods that are very different from the training of other groups analyzed.

Principal findings of the qualitative data collection on players (5 interviews)

All interviews were conducted personally and individually. Beginning the analysis by the interviews made to the players³⁴, we have reflected those questions of greater relevance for this study, leaving in quotation marks some of the literal expressions expressed by the interviewees.

Regarding the question about **what relevant factors could condition a player to make the decision to participate in match-fixing**, the 5 interviewees highlighted the economic factor, like the most influential one. Also, one of them highlighted the environment and the habits of the player, and another emphasized education factor.

“They told me that a teammate of a 2B team, earn more money by fixing one single match than playing the entire sport season” (Player 2nd Division B).

“I think training is important, to have values and know the constraints that entails a theme of bet or match-fixing” (Ex - player).

Regarding the question **if a player could manipulate an encounter by himself**, the majority (3/5) of the interviewees immediately directed their response towards fixing the result, answering that a player alone could not rig a match, “perhaps the goalkeeper”; specified one of them. It is interesting that in the next question – **To agree a certain number of cards or corners is match fixing? and can a single player do it?** - almost everyone tint their answer; two of them answered affirmatively, and although the other two also answered also affirmatively, they granted greater gravity to the result-fixing.

“Manipulate but at other levels, I think it is more serious to manipulate or fix a result than another single action of the game”; (player 1, 2nd Division B)

“Nowadays you can manipulate anything, both corners or cards. It is just as serious to manipulate a result as to agree on an action of the game, because in both cases you are against the spirit and values of sport” (player 2, 2nd Division B)

To the question **if they believe that there are organized crime groups or “mafia” that pressure players to manipulate a game**, and if so, if they have ever experienced such a situation in their own person or a partner, the 5 responded that they had never lived this kind of situation, although one of them

³⁴ Made in AFE headquarters, during a single day, in a day of 3-4 hours.

commented that he knew some teammates who have been offered to fix a match by certain people but he think it was not an organization. Though they have not experienced a similar situation closely, 4 of them said they were not surprised about their existence, due to the proliferation of online bets and all the money is being moved.

"I know people who have been proposed but not by mafias"; (Player 2nd Division B)

"It seems normal to for me that these organizations exist, because it's a matter of money, if they can get some profit, then they will exist". (player of 3rd Division)

The second part of the interview aimed to investigate **which are the trusted stakeholders/authorities of the interviewees they would go to if they had knowledge of a match-fixing**. Once they knew who they would approach for, we asked them that: apart from communicating this trust link, **would they use a whistleblower safe hotline or protected reporting system to communicate this information.**

The answers obtained offer us very interesting data for this study, since the 5 football players interviewed agreed that their source of confidence in such a situation would be AFE. They would like to point out that AFE has a telephone that allows them to make anonymous reports (of any kind) but that if a hotline with guarantees would exist, they would prefer it, although they would still prefer AFE to manage it and no other third party. Two of them commented that LaLiga offers integrity courses and facilitated a contact or mailbox for these situations but that it would give them much more confidence and security that AFE would have access to these complaints and not LaLiga. In general, they opted more for the anonymous option, but several of them pointed out that is better to offer both options.

"Yes, I prefer anonymity, it gives more security to the complainant but the veracity is lost. If it is something confidential you would have to be completely sure that even if your name is not going to appear. Anonymity seems a little less serious to me. I would like both ways". (3rd division player)

"I would prefer it to be anonymous, I believe that fear is a factor, if it is confidential it creates a problem". (player 2nd Division)

"If they gave me the option of both ways, I would prefer both". (player 2nd Division)

"It gives me more confidence that the AFE will take". (ex-player, woman)

"I would like it to be AFE who will manage". (ex-player, man)

Once we knew about their opinions regarding sports reporting protected systems and their possible usage if they are safe and managed by a serious entity with guarantees, we get to know **whether they bet or know the consequences of betting and/or match-fixing.**

The conclusion we got is that the players do not see it as a very serious issue and treat it normally. His knowledge of the possible sanctions or repercussions is quite vague and inaccurate, because although only one of them admitted that he is betting, but insisting that he did it in the Champions League and that it was not bad because he did not participate in that competition, they all said not to bet but they commented with normality that they have teammates who bet regularly. They have no awareness of the repercussions that would have to bet or those that would have to fix a match, which indicates that they do not see the risk and that they feel impunity before those actions. We must dedicate efforts to teach courses to the players, because they are a fundamental piece for this type of illicit actions, they cannot be carried out without them. They must know the serious consequences that can generate both for the sport and for themselves to end up immersed in an agreement to fix a match.

"Yes, I have colleagues and friends who bet. You have types of bets that are legal. If you bet on a team that is not in your competition or in which your Club participates you can bet. It depends on each one"; (player of 2nd Division B)

With this scenario we started to ask about the opinion of the need for more information, training and courses from the different institutions, especially in terms of integrity and good practices and the consequences and damage to the sport generated by match-fixing. The general opinion was that with the course given by LaLiga at the beginning and end of the season is more than enough, emphasizing that they would not go to more courses if they were volunteers.

"No, I know what I should do, I do not need a course". (2nd division player)

"No, I do not need to, I have never bet". (3rd division player)

"Every season LaLiga gives a talk on this topic. I think it's enough, they do it at the beginning of the season and it does not take more. I would NOT go to more courses if they were volunteers". (ex-player)

This is one more fact to consolidate our conclusion regarding the lack of awareness and training about the damage that may involve participation in a match-fixing.

As we have observed in the analysis of the previous questions asked, they do not have a clear perception of what is considered to be match-fixing or whether or not they can place bets in their role as a professional athlete. They do not even know if their employment contract has a clause that imposes bans on gambling or punishes them if they end up involved in a match-fixing. 4 of the 5 respondents said they do not know if they have any kind of clause, so it is not only ignorance but also lack of interest in this field.

Although they do not show interest in knowing the consequences that it would entail or how the Football Federation regulates the match-fixing, everyone put a ten on a scale of 1 to 10 to the problem of match-fixing and its harm to sports.

“Fixing a match can decide whether to be a champion or not, it’s throwing up your future”; (player 2nd Division B)

“I give a 10, match-fixing is more serious than doping issue”. (Player 3rd Division)

Principal findings of the qualitative data collection on coaches (4 interviews)

The following group of interviews was carried out with the coaches³⁵, using the same method of analysis as with the players.

Regarding the question about **what relevant factors could condition a referee to make the decision to participate in match-fixing**, the 4 interviewed highlighted the economic factors, although they affected that a person does not make him or herself a coach for money but for vocation since the salaries you get are very low and the chances of being able to train in 1st or 2nd Division are smallest. It is interesting that two of them also pointed out that the values of each one is a factor to take into account when participating in an event of this type.

“In the 1st and 2nd Division the salaries are great but in the rest of the categories the salary is low and it is done by vocation, your parts of which it is difficult to reach the top. If someone does, I understand that the factor would be economic” (coach of 2nd Division B)

“It’s a question of values, it is a decision more related to values than to personal circumstances”. (coach of 1st Women’s Division)

³⁵ Held at the headquarters of CC.

When asked if a coach could manipulate a match by him or herself, half of the respondents said unequivocally that no, but the other two did not hesitate to answer that they can fix a match. The explanation of each interviewee lets us see the importance of understanding what is match-fixing, in order to fight against these illegal acts, since those who answered no, oriented their response towards the manipulation of a result.

"A coach cannot fix a match on his own because he is out of the field, not on the field"; (Coach 2nd Division B)

"Take have a more or less competitive team does not assure you anything"; (Coach 1st Division)

"Reach an agreement with someone regarding a result"; (coach of 3rd Division)

In those who answered yes, we can see how the concept they have of match-fixing goes beyond the simple result-fixing and therefore, their responses include the possibility of any alteration, being the positive response to the possibility of being able to manipulate an encounter by themselves.

"Everything that is illegal is match-fixing. Everything that is unjust must be sanctioned"; (Coach 2nd Division B).

"Yes, taking out an unusual alignment, talking to players and agreeing questions with them". (coach 2nd Division B).

"Match-fixing is to perform an activity in which the values of the sport are not present, at the ethical level". (coach of 1st Women's Division).

To the question **if they believe that there are organized crime groups or "mafia" that pressure players to manipulate a game**; and if so, **if they have ever lived a situation like that in their own person or a partner**, 3 of the 4 interviewed replied that they had never lived or known anything about it and they are surprised by the cases that are taking place in Spain although they believe that it is happening now due to the proliferation of the betting houses, but one of them claimed to have lived it directly, although he did not want to explain the specific case in the interview, making it off record, an issue that poses us, being the interviews completely anonymous, if there really is fear in the collective of talking about these issues, not so much because of the existence of these "mafias"; that as we have seen in Spain they do not have much

weight - but much for the "unwritten codes" of sport in which the "snitch culture" predominates as a behavior disloyal towards his companions.

"I'm not surprised that match-fixing is spreading out more and more, especially since there are betting houses, especially for the most vulnerable categories, in the lower ones" (2nd Division coach).

As with the rest of the groups of interviewees, we continue the interview in order to know **which are the trust people or institutions (target / stakeholders) they would go to if they know of an irregular situation in relation match-fixing**. 3 of the 4 respondents said they would go to the Club or/and the Federation and only one answered that they would go directly to the police. It was interesting the answer of two of them who state that they have lived such situations and have not known where to turn, they have no knowledge of the protocols or procedures in these cases. They say that La Liga gives them a talk about bets and match-fixing at the beginning and end of the season, but that only their protocol tells them through an email but that as it is now, the complaints media would not do it if they did not have the total certainty, a question that in sport is very difficult to be unless you have physical evidence of it (recording, documents, testimony, etc.).

"I would go to the federation and I would inform the Club so they could take the appropriate measures, but as long as I was totally sure". (Coach 2nd Division)

"To the Club, to those responsible and that they act or advise me. I would not know how to act, I would tell my friends". (Coach 1º Feminine) "I had proof but I knew where I had to".

"I would go to the police and I understand that they will have a protocol for these things". (Coach 3rd Division)

"It is very easy to blame and difficult to prove, you should have proof". (coach 2nd Division)

"When there are upgrade promotions, deals are made and some players receive calls". (Coach 2nd Division B)

Regarding **if they would use a protected reporting system**, they all replied that they would use it although they differed in their answers regarding the players when we asked them if they would prefer it to be anonymous or confidential and who would like it to be managed, in this case, the majority answered that

they would prefer it to be confidential, since anonymity would cause false accusations. Regarding which institution would prefer to manage it, all agreed that the RFEF, because they think that La Liga has many means but that it is still a private entity that looks for its own interests. They see the Federation as the appropriate institution to manage this channel because they understand that it is the body on which it depends professionally and separately it can be audited by an independent body having delegated functions.

"If there is an anonymous channel what it would provoke is denunciations by bad interpretations, surely because you have had a bad result and suspicions. That channel will give rise to false denunciations if they are anonymous". (Coach 2nd Division)

"Should be linked to the RFEF, because it is who manages the championships, at least that they were involved" (coach 3rd Division)

"If is regulated by the Federation, it can be publicly audited through the Higher Sports Council" (2nd Division coach)

Once we know listen about their position regarding protected reporting systems, we get to know **whether they make bets or know the consequences of betting or fixing any action of a match**. They deny making bets but do not know the consequences if they made them. Some think it would be a criminal issue but do not know if the Federation or its Club could act, although two of them say they have a clause in their contract that does not allow them to bet but they do not know what the consequences would be.

Although regarding the knowledge of the consequences of match-fixing or betting are similar to the players, their level of awareness with the problem is very different, they all understand that it is a serious issue where more resources and efforts must be invested than there are currently and that the courses should be obligatory and more frequent. Regarding those trainings that they receive, they told us that they never receive specific tailored trainings regarding match-fixing, and therefore, they do not have the necessary information to know how to act or behave in these cases or the consequence of carrying them out.

"I do not know if it is included in the Code but I understand that it is sanctioned by the State"; (coach 2nd Division)

"They have not given us specific courses" (coach 2nd Division)

"Yes, if time allows me if I would go to courses, I think it is important and especially for the players"
(coach 3rd Division)

"I think it is important that the Committee invests in those courses" (coach 1st Women's Division)

"I am a teacher of coaches and I would put these issues as a mandatory subject" (coach 2nd Division B)

We can conclude that the difference in age and training means that between players and coaches there is a great difference of opinion in the consideration of bets and the investment in training to stop the phenomenon of match-fixing. It is a fact to take into account when managing and planning the training, because you have to have these issues present if you want to transmit effective a message in order to be useful for the different targets.

Principal findings of the qualitative data collection on referees (5 interviews)

In the last block of the interviews, we had the opportunity to have a personal meeting with 5 referees³⁶ of the different categories that arbitrate in Spain. Regarding the question of **the factors that can lead a referee to fix a match**, it is very interesting to know the opinion of this group, since all agree that, excepting isolated cases that may have a personal problem that leads them to end in this type of illicit, the economic factor is not determinant to finish manipulating a meeting. They comment with discretion, that in Spain and Europe they do not consider it a reason for these acts, since the referees of professional leagues (in Spain: First and Second Division) have good incomes and salaries, and those who arbitrate in lower categories their goal is to reach the professional divisions, so they would not play with their professional future by fixing a match. They declared that if one puts in the balance what they win and what they lose, it would not compensate to enter into these questions. They attribute it to a moral or ethical question of each person more than a generic objective factor that can influence them. However, one of the interviewees pointed out that maybe in the last years of your sports career the economic component could be a relevant factor in order to be more tempted.

"The referees have more or less standardized conditions, which make you have a more or less relaxed stable life because in the end it is a world that when you get to important categories you do not need to do this kind of thing". (Referee 2nd Division)

³⁶ Carried out in the RC, at the headquarters of the RFEF, during a single day, in a 4-hour session.

"To the referees what matters most to us is our personal promotion, to go as far as possible and that depends on our performance and our performance is based on doing things well". (Referee 3rd Division)

"In Spain and Europe I would rule out the economic reason, because we have a pretty good salary. So is useless to complicate your life for something that is not comparable to what you can win." (referee 1st Division)

When we asked them **if a referee can fix a match by him or herself**, it was good to know that 3 of the 5 referees interviewed did not hesitate to answer affirmatively, orienting their response not only to understand match-fixing as fixing a result but to alter pre-determinedly any action of the game.

"I would say no, without being noticed, getting a result by itself, without the collaboration of the players is very difficult"; (referee 2nd Division)

"Today, it is true that it is not only the result because it is bet corners, yellow cards, and in that concept is easier. When the least impact has the easiest act is" (referee 1st Division)";

"Of course, like a player, a coach. A referee or a goalkeeper is more decisive, well, in the end they are all important and they can do it because they influence all the decisions of those people. Although a referee of the most important by the influence of their decisions in the game" (referee 2nd Division B)

"Of course, you take 3 penalties and you have already fix it. It's easy, it's something subjective because we rule on the field. I do not have proof that someone has done it but it could be achievable"; (2nd Division referee)

As a result of the previous answer, the 3 referees who considered that they could **fix a match by themselves**, also answered that it is match-fixing to agree on a result as a corners or a penalty, unlike the other two interviewees, than on the question whether to agree on a certain minute to draw a yellow card was match-fixing they answered that now with the bets culture it could be, but that it does not have the same gravity as fixing result.

"I consider that if a referee decides to book someone, he bets for example two cards, which is easy for the referee, has less influence on the result than agreeing on a result" (referee 2nd Division)

"At the moment you pass the line with a corner or a card, you have crossed a line that you should not never passed and that is very serious". (referee 1st Division)

To the question if they believe that there are "mafias" that pressure players to fix a game, and if so, if they have ever experienced such a situation in their own person or a partner, the 5 said they had not lived a situation like this and do not know any "mafias" in Spain although they know that some players sometimes receive certain offers and in lower categories sometimes see rare environments in the grandstands, but they conclude that in Spain there is no latent problem with criminal organizations in this area, which it does not mean that it is a situation that we have to tolerate and we must not fight from education, because the increase of bets in the country that has the national football competition with more followers of the world, sooner or later its appearance will be a reality and the problems of the match-fixing will no longer be a personal decision of each one but will have an external component ("mafias" and organized crime) against which the different targets of the sport will have to deal.

As with the rest of the groups of interviewees, we continued the interview in order to know **which are the most trust people or institutions (target / stakeholders) they would approach or inform if they knew about match-fixing or something irregular**. In this case, one of the referees told us that he had experienced a situation of this type and that he did not know who to inform or approach but he would have liked to have a safe and protected reporting system to be able to denounce the facts, because although they were suspicions, they were enough flagrant to have been investigated. Regarding the **institution or person of trust to which they believe they would inform in the first place**, it would be the RC or if not the Federation. All the referees commented that if they had a secure hotline that would guarantee them some rights before the denunciation of some facts they would use it, although several of them pointed out that in football many actions that are sets of the game can be understood as suspicions of manipulation, so they would only inform or report if they were absolutely sure of the infraction, because they understand that they can cause harm to a partner equivocally.

"First, I think I would go to the Technical Committee of Referees, I would talk to them and from there we would take the necessary routes"; (1st Division referee)

"In our Committee we have a secretary who is with us every day, a technical director and a president who are 100% open and transparent and if you go to his office is always open"; (referee of the 3rd Division)

"Of course, if it was a flagrant thing, but when it comes to communicating such a serious issue in the end you have to be sure"; (referee of the 1st Division)

"I cannot assure you that the match was bought, I cannot say for sure, there were rare but clear actions, they can be random or lucky. And you see yourself meddling in a process that you do not want to be in. A judge or somebody is going to call you and to me the less affected better".; (referee of 2nd Division B)

In this group, they also consider that the reporting system should be managed by their closest body, the RC or the Federation, but it is curious that 4 of them agree that although they would like it to be managed by the RC, they would prefer that it was an independent external body that did not have a direct or professional connection with them. When we asked **if they consider that it should be better confidential or anonymous**, the majority chose confidential, since they pointed out that it is a professional matter and that they would not be afraid to denounce if they were guaranteed a certain security and that the investigation would not affect them unfairly.

"For me it would not be a problem that was internal or external, because with the Committee I have total confidence. And if it were external, I would understand that it is a safe medium so it would not be a problem either." (1st Division referee)

"But for me, the RC is my house, but if it were an independent body that offers an external reporting protected system, I would maybe prefer to do it that way". (referee of 2nd Division)

"If I could have sent an email and asked them to review a match, I would have done it without any doubt. However, if you would have to be before a judge, you do not want it, because it generates a problem". (referee of 2nd Division B)

"I would not be afraid at a certain moment to denounce some sign or evidence, on the contrary, the problem is who is committing it, not who puts it into knowledge." (referee of 2nd Division B).

When we asked **if they know about the consequences of participating in match-fixing**, although it is a very different group from the rest of the respondents because of its peculiarities, in this field they have the same lack of knowledge as the rest of the targets, since they are unaware of the repercussions that it would entail committing these acts, which is alarming. This situation in turn reflects a neglect on the part of the institutions in the face of a real problem that is affecting the different sporting bodies. Most of them

affirm that they know what is forbidden and also affirm that they have received some talk in this sense - although not specific to these issues - so, seeing the position of the institutions, it is not surprising that neither the referees are giving importance to this matter.

Another aspect to highlight of these interviews is that it seems that the effort of the institutions depends on the category in which the referee participates, since those who participate in higher categories (1st and 2nd Division) have received more talks or courses in this sense, which does not happen in those who referee in amateur categories (which is where the problem is most intense). They have not received specific courses on integrity and the fight against sports corruption, in the lectures and upgrade exams, they have certain questions related to these aspects, but as we have seen, they lack knowledge in this field, to the point of not knowing the repercussions that would have if they place a bet in a game in which they participate or in those in which they do not participate. One of the benefits offered by public and well-known sanctions is the potential dissuasive effect that produces in its alleged transgressor, because if they do not know the consequences of their actions, the individual will not have that preventive barrier that produces knowing the consequences of them.

"Obviously I know I cannot influence the result or bet, but the sanction I do not know what it would be and they have not given us any course in this regard."; (Referee 3rd Division and 2nd Division B)

"For the talk they gave us, they told us indeed more or less how far would the problems would be of having an account in a betting house or to bet not only in matches, but in competitions that you are involved. They gave us some basic notions because in the end the talk is 60 minutes, they were not more, but more of a legal scope, not of an internal scope of refereeing". (referee 1st Division)

"I know that it appears in the Regulation. When we made exams, apart from the rules of the game, they examine us about the regulations and the disciplinary Code"; (referee 2nd Division B)

"Yes, both the Spanish Federation and Madrid have their disciplinary code and we have to be evaluated regarding them. They are public documents and we have to know them"; (referee 2nd Division B)

"I do not know what the penalty is if I fix a match"; (referee 2nd Division).

This is a mistake that we have been seeing during the different projects of this kind where we have participated, because it is not only in football (see tennis for example) where the institution's efforts to give courses or talks to the potential involved in match-fixing are concentrated in the higher or more professional categories, when the problem is not concentrated in those elite athletes, but in the categories where the

athletes do not earn such high sums and the temptation to obtain extra money for manipulating an action of the match It is potentially high.

Therefore, we have to analyze why the institutions are not investing major efforts to fight against this scourge in the categories that need them, it could be, as we are seeing along the study, that the institutions really are not aware of the problem and only build up make-up policies and programs to "please" the citizens and other institutions that demand greater concern and intervention in these issues?

Between the dissimilarities regarding training respondents', we ask them if they would like more courses, and if they would go if they were volunteers. In this case, unlike the players, all affirmed that they would like more training and especially information in these matters and that they would attend all the voluntary trainings that would be offered, as long as it were compatible with their profession and their working day, because many referees combine their field work with other professional areas outside of sport.

Interested data seemed to us to know about the perspective of the referees regarding the reinsertion into the sport of those who have been sanctioned and have fulfilled their sentence for fix a match in the past. The majority of the interviewees of the other groups were quite flexible with this issue and compared it with another situation outside the sport, offering another opportunity those sanctioned by match-fixing. In this case, the referees are more restrictive with their opinions on the matter, mainly because they do not compare it with another work activity, giving a greater emphasis on the values and sports ethics that sports professionals should have, so in this sense, 3 of the 5 respondents answered with conviction that they do not believe in the reinsertion of peers who have been sanctioned in these aspects because they have shown no values and put the economic factor before sport's integrity, so they could never trust that person never again.

"That question is difficult, for my tolerance 0 in that case, because in the end It's a matter of money and if money is a factor that affects you, you can do it again at any other time"; (referee of 2nd Division B)

"In first and second division referees do not need to win money because they have a good salary but in lower categories, even if they have that need, it would cost me a lot to reintegrate in the collective". (referee of 2nd Division).

4.2.4 General key findings, conclusions of the data collection and recommendations

From all the data collection, and noticing the objective of this project, we can conclude that there are certain factors that must be taken into account when guiding the training of athletes in sports regarding protected reporting systems, because without the knowledge of these peculiarities, its implementation would not be as productive and efficient as it should be.

- a) Importance of the concept of match-fixing

The first aspect to keep in mind when building the bases of a training that addresses the need to report illicit practices in sport, is the concept that athletes have of what is match-fixing and the seriousness or not seriousness that they give to these actions. We have been able to observe that most of the interviewees understand manipulating a meeting as the previous agreement to predetermine a result. Today, with the proliferation of sports betting and illegal organizations that are nourished by the possibility of betting on any game action, the concept match-fixing cannot be limited to the result, as this produces conviction among athletes that to agree other actions of the game (cards, corners, outside of game, etc.) does not harm the competition nor generates disloyal towards its Club or hobby. This conception is very dangerous, because as we indicated, the values in this sector greatly influence its actors. If a player, coach or referee understands that while you are not agreeing to alter a result, you are not being disloyal with your professionalism and your duties in front of your Club and the sport, we cannot fight this phenomenon with training or sanctions, so you have to influence the negative effects that any type of agreement entails altering in a deliberate and premeditated way a set of the game, although these at first will not influence the outcome of the match or classification in the competition. Before creating hotline, it is necessary to achieve that the actors understand all the ways of damaging the sport and the danger that they contain.

Some phrases obtained from personal interviews when asked if they can fix a match on their own:

"Manipulate but at other levels, I think it is more serious to manipulate or fix a result than another single action of the game"; (player 1, 2nd Division B)

"A coach cannot fix a match on his own because he is out of the field, not on the field"; (Coach 2nd Division B)

"Yes, taking out an unusual alignment, talking to players and agreeing questions with them". (coach 2nd Division B).

"I would say no, without being noticed, getting a result by itself, without the collaboration of the players is very difficult"; (referee 2nd Division)

"Of course, like a player, a coach. A referee or a goalkeeper is more decisive, well, in the end they are all important and they can do it because they influence all the decisions of those people. Although a referee of the most important by the influence of their decisions in the game" (referee 2nd Division B)

"I consider that if a referee decides to book someone, he bets for example two cards, which is easy for the referee, has less influence on the result than agreeing on a result" (referee 2nd Division)

Regarding the social and personal factors that may influence the decision to accept or offer the manipulation of a meeting between the actors, **the economic** one stands out above all. Within the economic factor seems to be a key element, also include as a condition that the athlete is in the final years of his professional career, lack of sports values or also the environment that surrounds them.

In this sense, we can deduce with these data two lines to take into account for our work: (1) the sanction must be hard enough to have a deterrent effect and decrease the economic attraction and (2) we must influence the training within the amateur categories regarding the problems that would cause their professional future to have a sanction of this type and the consequences for a possible professional exit if they want to remain united to a sporting establishment³⁷. It is necessary to indicate in the prevention, detection and sanction to achieve dissuasive effect.

b) The disloyalty culture of the whistleblower: The code of silence

The vast majority of respondents agree that currently in Spain there are no criminal organizations that oppress or coerce the athlete (NOTA AL PIE: In general, from the interviews we can conclude that in Spain there is no latent problem of criminal organizations in sport, which does not mean that it is a situation that we must fight from education, because the increase of bets in the country that has the national football competition with more followers of the world, sooner or later, its appearance will be a reality and the problems of manipulating matches will no longer be a personal decision of each one but will have an external component (mafias) that different Sports targets must confront.). In Spain, as in other European countries, there is a concept of the informant that makes him look like an informer, a "snitch"; who is betraying his group. Within the sports field, this is magnified, since the ties of affectivity are greater than in other professional sectors. A feeling of disloyalty is generated in front of the comrades that makes it more difficult for them to dare to denounce.

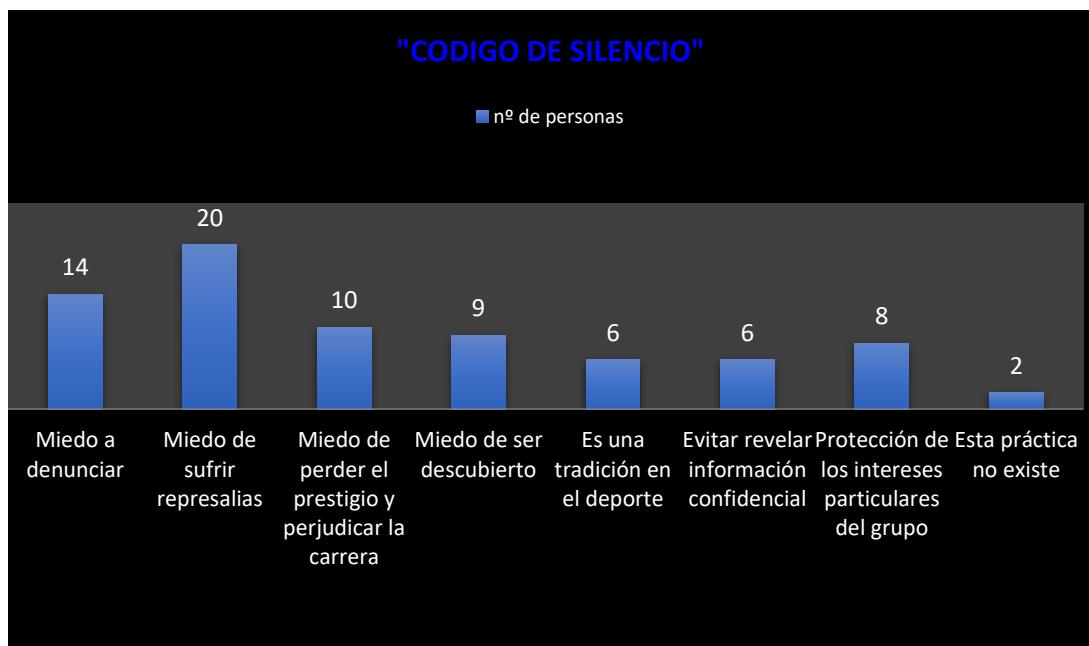
If we analyze the quantitative data, we can see how the answers with the most votes, when asked what are the factors that cause a code of silence to be maintained at the time of reporting a partner or irregular practice within a team or discipline, are the fear of retaliation (27%) and the fear of reporting (19%), followed by fear of prestige and prejudice to sports careers (13%). But as we said, it is not due to a fear caused by a third party, but to fear of the reaction of your environment and ignorance of the consequences that a complaint will have. Today, there is a large regulatory gap in relation to effective and safe reporting

³⁷ From analysis of the surveys developed in the project AMATT (Anti Match-fixing Top Training) we learned that most athletes want to remain united to the different areas of sport once their professional career is over.

systems, which generates distrust in the complainant and limits the interest in communicating certain facts of a criminal nature. This task has to be addressed both by regulatory bodies and by organizations internally. In turn, organizations must ensure to create a culture that encourages and changes the conscience of the athlete at the time of reporting. The actors of the sport have to understand these actions as one more act within your obligations as a professional. To achieve this change, they have to take investment in training and information very seriously.

Therefore, it is important (1) not only to overthrow the whistleblower's conception but also (2) to guarantee the safety and protection of the whistleblower, offering clear and accessible information about the rights and duties that surround him when communicating facts that may be illegal within the sporting activity.

Figure 10 - Reason for the code of silence



The little cultural acceptance and the scarce practice of reporting in sport can be seen in the following graphic. Respondents were asked about the consideration that athletes have to make complaints about the match or competition match. 56% answered that it is an unacceptable practice within the sport to issue a complaint if you have knowledge of those facts.

Figure 11 - Acceptability of the complaint in sport

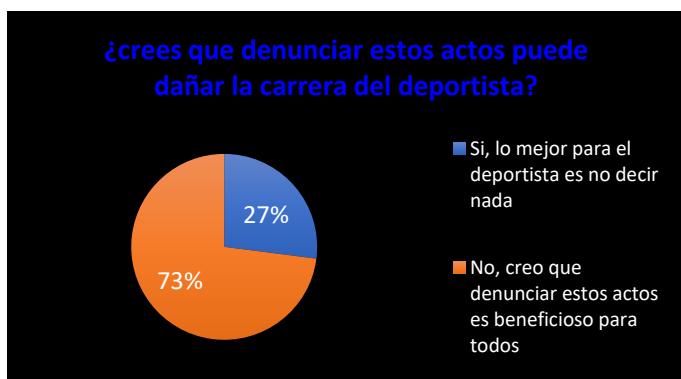


Another factor that affects these data is the component of the test and chance. In sport, chance is an element present in every action that can occur in a game. On many occasions, many actions that are sets of the game can be understood as suspicions of manipulation. For this reason, the test is a difficult factor to obtain if we do not have the collaboration of sports actors who have direct knowledge of the facts.

To date, many countries have legislations that allow investigating, through criminal law, fraud in the practice of sports activity. In the case of Spain, since 2010 the Criminal Code regulates corruption among individuals in the sports field. This allows the use of means with which the sanctioning administrative channel does not count, which have delegate in some matters (as is the case of the sanction of the fights) sports federations. The intervention of communications, home searches, monitoring or other means of investigation are only within the scope of criminal law, but this does not guarantee the success of the investigation, because obtaining the evidence or evidence that allows to start all these means it is the most difficult to obtain because of the non-controllable variables of the game and the characteristics of the rules that regulate it.

The majority of interviewees agreed that, to denounce some facts in sports, you have to be totally sure of the veracity of them, a matter as we had been pointing arduous and tedious. When asked if they would denounce a match or other act contrary to the practice of sports, it is worrisome that 27% pointed out that reporting can damage your sports career and that the best thing for the athlete is to say nothing.

Figure 12 - If reporting fears reprisals?



"Of course, if it was a flagrant thing, but when it comes to communicating such a serious issue in the end you have to be sure"; (referee of the 1st Division)

"I would go to the federation and I would inform the Club so they could take the appropriate measures, but as long as I was totally sure". (Coach 2nd Division)

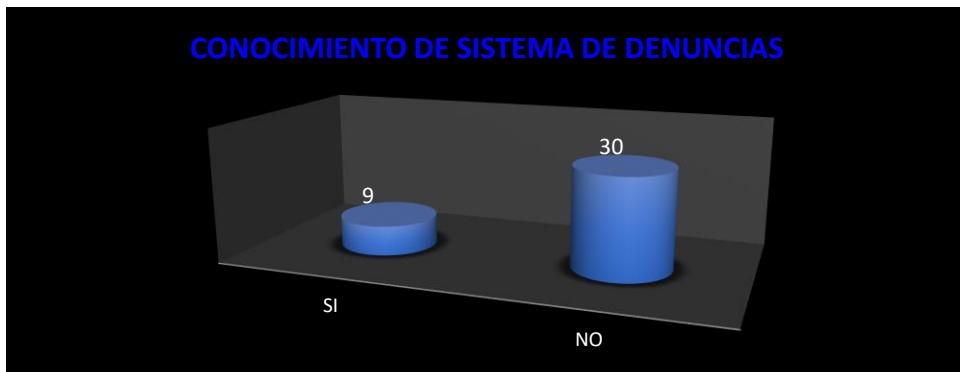
"To the Club, to those responsible and that they act or advise me. I would not know how to act, I would tell my friends". (Coach 1º Women) "I had proof but I knew where I had to".

"It is very easy to blame and difficult to prove, you should have proof". (coach 2nd Division)

"I cannot assure you that the match was bought, I cannot say for sure, there were rare but clear actions, they can be random or lucky. And you see yourself meddling in a process that you do not want to be in. A judge or somebody is going to call you and to me the less affected better". (referee of 2nd Division B)

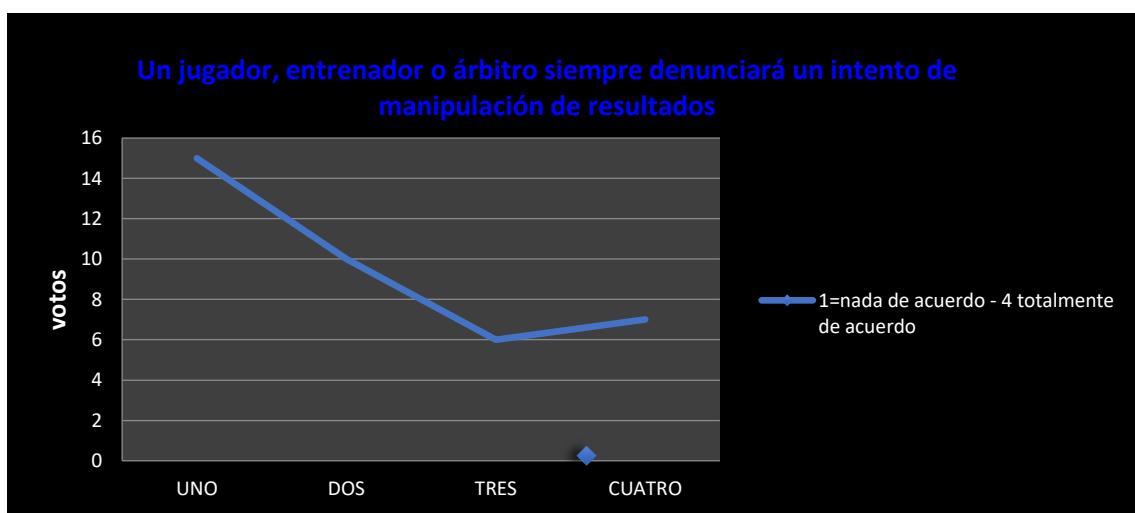
In turn, 77% of respondents are not aware of the existence of complaint channels. In this case, two different questions were asked; if they knew of the existence of a specific complaints channel to make a report and if they knew within their federation, association or club any means or way of making a complaint. The answer was the same in both questions; 30 of the 39 respondents answered that they did not know any way to file a complaint.

Figure 13 - Are you aware of the existing of reporting systems?



One of the key points in this phase was to check the predisposition of the actors to inform the authorities concerned of the knowledge of irregular facts, through secure reporting systems. On the other hand, it was important the knowledge they have about the mechanisms that institutions currently offer to make such complaints and the guarantees they offer. We have been able to verify that the ignorance of the means and resources that exist in the sport to denounce or report is ample, reason why it is necessary to dedicate many more efforts to communicate to the actors the different possibilities and tools with which they count and the protection that they go to receive if they decide to expose it.

Figure 14 - A player, coach or referee will always report an attempt to manipulate results?



c) The actors have the perception that match-fixing is not persecuted or is sanctioned

If we start, with the data analyzed, that match-fixing is not considered a risk for athletes, efforts to create and establish secure complaint systems will never have the expected result. Not only is it necessary to invest in implementing channels or systems that allow the complainant to bring information to the

attention of the complainants safety and protection standards, but first and foremost we must train athletes and instill in them the importance of these acts for the development and the future of sport.

We can observe, as the actors have the perception that these practices are not persecuted or sanctioned by the sports authorities. If the actor (informant), considers that these practices are neither prosecuted nor sanctioned, they convert the complaint systems into inefficient tools.

An athlete who thinks that if he denounces a colleague will not be sanctioned, he has no incentive to expose illegal practices. In the same way, the one who commits sport fraud is not going to consider the legal or punitive factor, since he has the conception that it is very difficult to be discovered, and if it is, he has the perception that he will not be sanctioned or that The sanction will not have consequences for his sports career or his relationship with his professional environment.

We can see in the following graph how the respondents have no sensation of being discovered before the commission of a match-fixing, 36% consider that the probabilities of being discovered are low, compared to only 8% who think they are high.

The same happens with the probability of being sanctioned. Although in this case, 21% consider that if they discover you there is a high probability of being sanctioned, the percentage of those who think that even being discovered the probability of being sanctioned is very low (23%) is an important fact - and worrying - for this investigation.

For these reasons, institutions have to devote much more effort to externalize the message of non-tolerance to these practices and demonstrate, on the one hand, that agencies are investing in means to detect these practices and, on the other hand, that once the athlete is discovered, if his participation and guilt is proved, he will have a consequent sanction for his future professional in the sport.

Figure 16 - Probability of being caught



Figure 15 - Probability of being sanctioned



d) Athletes prefer a confidential reporting system

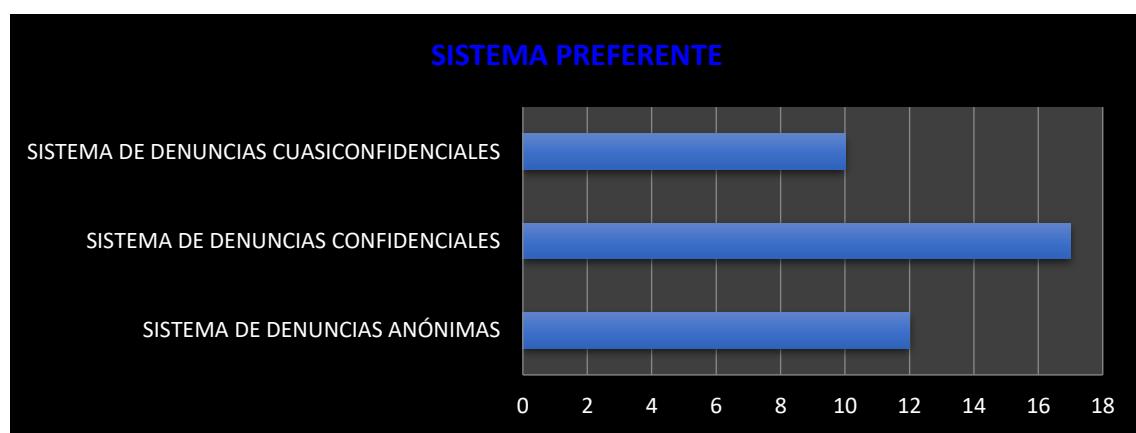
In response to the questions of which management system or model they consider most appropriate and which system they would prefer if they had to file a complaint, the most voted response (between confidential, anonymous or quasi-confidential system) was a confidential complaint system. From the experience of other projects (such as AMATT) we have been able to verify that there is a deficiency in the knowledge of the types of complaint systems and their application. For this reason, within the questionnaire, a small definition of each type of system to be selected was provided. The most voted system, the confidential one, was defined in said questionnaire in the following way; "The complainant is identified and can be called as a witness or can provide additional documentation or other evidence to support his complaint. The complainant must be guaranteed full protection against any reprisal, except in cases of bad faith".

Under this premise, 46% of respondents answered that the most suitable system to detect possible illicit behaviors in the sports field was the confidential system and 42% answered that this system is not only the ideal one but the one they would prefer to use if they had to put into knowledge facts contrary to good sport practices.

Figure 17 - More suitable system



Figure 18 - Preferred system



During the personal interviews, this topic was also discussed, with different answers among the interviewees, although the confidential system prevailed as the preferred method among them.

The players mostly opted for an anonymous system, but commented that if there was the possibility of choosing if they wanted to do it anonymously or confidentially, they would like to be given the two options and, depending on each case, decide which one is the most appropriate for the facts that you want to denounce.

"Yes, I prefer anonymity, it gives more security to the complainant but the veracity is lost. If it is something confidential you would have to be completely sure that even if your name is not going to appear. Anonymity seems a little less serious to me. I would like both ways".; (3rd division player)

"I would prefer it to be anonymous, I believe that fear is a factor, if it is confidential it creates a problem". (player 2nd Division)

"If there is an anonymous channel what it would provoke is denunciations by bad interpretations, surely because you have had a bad result and suspicions. That channel will give rise to false denunciations if they are anonymous". (Coach 2nd Division)

The coaches for their part, said that a confidential channel is the most appropriate system, "because anonymity would cause false reports".

The referees, like the coaches, prefer a confidential complaint system. They argued their choice to an obligation of their work. So, if they guarantee their rights, they would have no doubt to denounce.

One of the referees told us that he had experienced a situation of this type and that he did not know who to inform or approach but he would have liked to have a safe and protected reporting system to be able to denounce the facts, because although they were suspicions, they were enough flagrant to have been investigated

"If I could have sent an email and asked them to review a match, I would have done it without any doubt. However, if you would have to be before a judge, you do not want it, because it generates a problem". (referee of 2nd Division B)

"I would not be afraid at a certain moment to denounce some sign or evidence, on the contrary, the problem is who is committing it, not who puts it into knowledge." (referee of 2nd Division B).

Figure 19 - To successfully combat match-fixing in Spain, it is necessary to create a safe and effective protection reporting system that guarantees whistleblower protection?



e) Athletes prefer a reporting system managed by the Spanish Royal Football Federation

Both personal interviews and surveys reach the same conclusion; The preferred body to manage a complaints system in sport is the RFEF. If we look at the following graphs, we can observe how, before the questions; which is the organisms that you think you should go to if you had knowledge or suspicion of an illegal act and which is the body that should manage a platform of complaints to be reliable, effective and safe, the most chosen response was the RFEF. 48% of voters prefer to go to this organization if they have to report and 47% believe that the RFEF is the ideal body to manage this system of complaints.

Figure 20- Which body do you prefer to report?

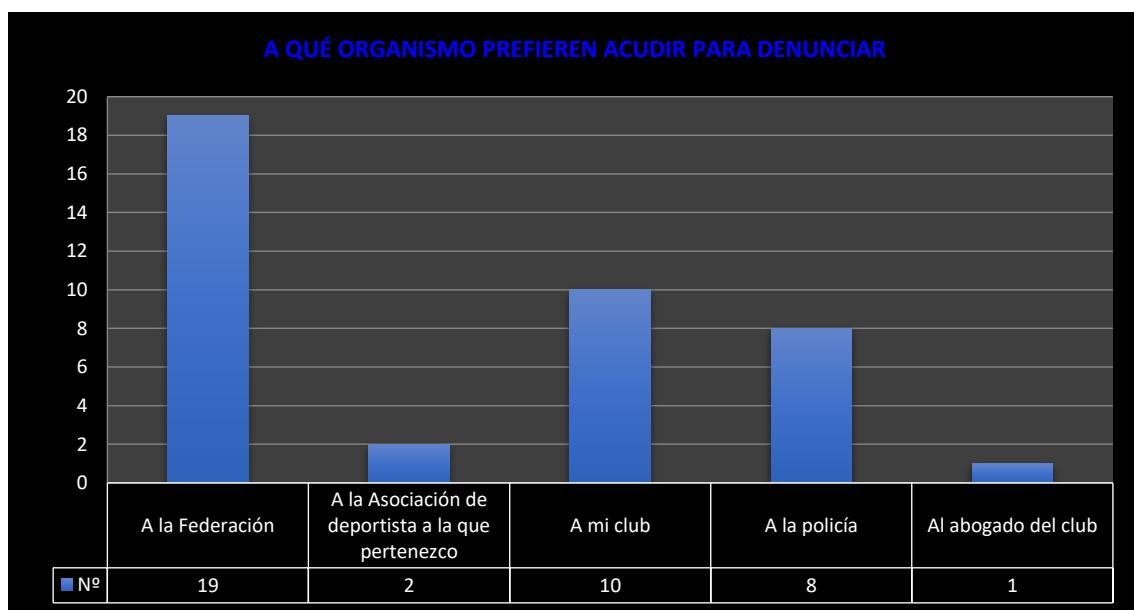
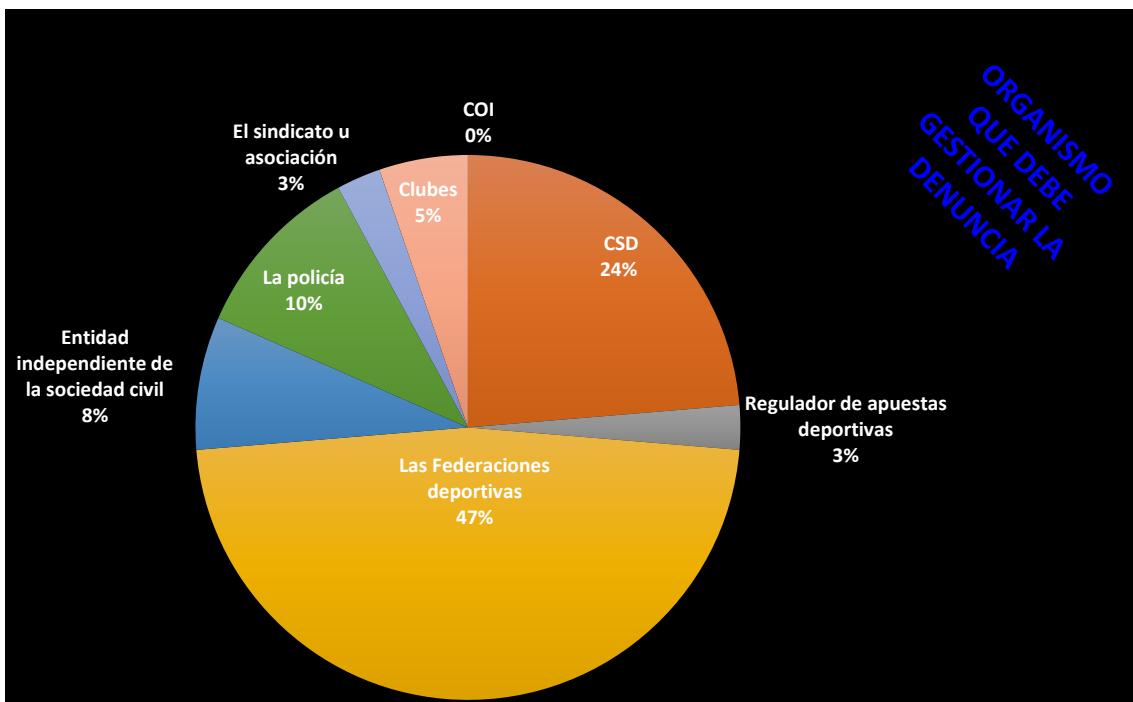


Figure 21 - Which body should handle the complaint?



From the interviews we could deduce that the actors prefer that the reporting system be managed by entities they trust, with which they have a direct relationship or a connection, the RFEF being the most appointed (except for football players who prefer to be their professional union AFE). Although many of them point out that La Liga is currently more prepared to carry out this management, they prefer that the federative bodies have management intervention, regardless of whether other entities participate in the process. For all this, we must take into account when deciding and picking up the candidates for the upcoming training, to choose those people who participate in the management of these reporting systems in the sports bodies mention³⁸.

"Should be linked to the RFEF, because it is who manages the championships, at least that they were involved". (coach 3rd Division)

"If is regulated by the Federation, it can be publicly audited through the Higher Sports Council". (2nd Division coach)

³⁸ In this sense, as described in point II. b) of this report, the current reporting systems of the bodies of the RFEF, as well as the rest of the sports entities and bodies analyzed, are deficient. They do not have sufficient guarantees to provide security coverage to the complainant and guarantee the rights that must protect the whistleblower.

"First, I think I would go to the Technical Committee of Referees, I would talk to them and from there we would take the necessary routes". (1st Division referee)

The most important point for our mission in this phase was to check the predisposition of the actors to inform the authorities concerned of the knowledge of irregular facts, through secure reporting systems. On the other hand, it was important the knowledge they have about the mechanisms that institutions currently offer to make such complaints and the guarantees they offer. We have been able to verify that the ignorance of the means and resources that exist in the sport to denounce or report is ample, reason why it is necessary to dedicate many more efforts to communicate to the actors the different possibilities and tools with which they count and the protection that they go to receive if they decide to expose it.

In the same scenario as the previous recommendation, from the interviews we could deduce that the actors prefer that the reporting system be managed by entities they trust, with which they have a direct relationship or a connection, the RFEF being the most appointed (except for football players who prefer to be their professional union - AFE). Although many of them point out that La Liga is currently more prepared to carry out this management, they prefer that the federative bodies have management intervention, regardless of whether other entities participate in the process. For all this, we must take into account when deciding and picking up the candidates for the upcoming training, to choose those people who participate in the management of these reporting systems in the sports bodies mention³⁹.

Another important aspect when building the bases of a training that addresses the need to report illicit practices in sport, is the concept that athletes have of what is match-fixing and the seriousness or not seriousness that they give to these actions. We have been able to observe that most of the interviewees understand manipulating a meeting as the previous agreement to predetermine a result. Today, with the proliferation of sports betting and illegal organizations that are nourished by the possibility of betting on any game action, the concept match-fixing cannot be limited to the result, as this produces conviction among athletes that to agree other actions of the game (cards, corners, outside of game, etc.) does not harm the competition nor generates disloyal towards its Club or hobby. This conception is very dangerous, because as we indicated, the values in this sector greatly influence its actors. If a player, coach or referee understands that while you are not agreeing to alter a result, you are not being disloyal with your professionalism and your duties in front of your Club and the sport, we cannot fight this phenomenon with training or sanctions, so you have to influence the negative effects that any type of agreement entails altering in a deliberate and premeditated way a set of the game, although these at first will not influence the outcome of the match or

³⁹ In this sense, as described in point II. b) of this report, the current reporting systems of the bodies of the RFEF, as well as the rest of the sports entities and bodies analyzed, are deficient. They do not have sufficient guarantees to provide security coverage to the complainant and guarantee the rights that must protect the whistleblower.

classification in the competition. It is necessary to achieve that the actors understand all the ways of damaging the sport and the danger that they contain.

In Spain there are no criminal organizations that oppress or coerce the athlete. Therefore, we have to eliminate the element of fear from the equation. The culture of silence in Spain, especially in sports, when accusing a partner or an irregular practice is not due to fear but instead to the feeling of disloyalty in front of colleagues. The whistleblower in Spain, as in other European countries, has a whistleblower concept that makes him look like an informer, the “snitch”; who is betraying his group. Therefore, it is important (1) not only to overthrow the whistleblower’s conception but also (2) to guarantee the safety and protection of the whistleblower, offering clear and accessible information about the rights and duties that surround him when communicating facts that may be illegal within the sporting activity.

4.3 Portuguese report

4.3.1 Methodology

In order to evaluate the opinions, attitudes and perceptions about the whistleblowing protection mechanisms and complaints related to match-fixing cases, we intended to use a mixed-methods approach, mixing quantitative and qualitative data.

For the quantitative data collection, we designed an anonymous survey on the basis of the desk research and on existing Platforms to report match-fixing cases.

The questionnaire was directed at professional and grassroots players/athletes, coaches, referees/judges and managers/staff (club, sport federation, sports association) and was distributed to the sports associations, clubs, sports actors, in the disciplines of handball, basketball, football, futsal, American football, hockey and volleyball, through hard copies and an online platform.

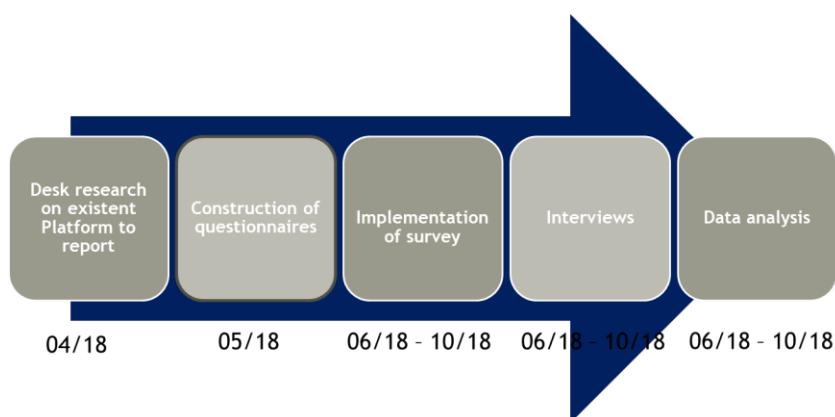
The survey was carried out with the collaboration of the Portugal Olympic Committee (COP), which disseminated it to the different federations, allowing the collection of data in other sports like athletics, racewalking, judo, swimming, shooting, snooker, taekwondo, ping pong, triathlon and sailing.

Qualitative data was obtained through anonymous semi-structured interviews. In order to carry out the semi-structured interviews, we used the privileged informant technique, following the logic of snowball sampling, in which each interviewee suggests new contact(s), who can speak openly about the subject.

Interviews were conducted with players, former players, athletes, former athletes, former referees, coaches, former scouts, officials and former journalists. Through the collaboration of the COP (official partner of the T-PREG project) and the Olympic Athletes Nucleus, a Focus Group with Olympic athletes was also held.

The working process took place between April 2018 and October 2018, as shown below.

Figure 22 - Methodology



4.3.2 Sampling

Quantitative sampling

The quantitative sample consisted of 295 respondents, 85% male and 15% female;

The majority of respondents were between 22 and 35 years old (44,07%), while the age group up to 17 years (including) represented the smallest share, with only 4,75%;

The majority of respondents were players/athletes (52,88%). The coaches represented 22,72% of the sample, while the managers/staff and the referees/judges represent 12,54% and 11,86%, respectively;

Only 11,85% of respondents had an agent;

The vast majority held positions at the senior level (68,81%);

The number of professional and amateur seniors was very close (36,95% and 31,86%, respectively);

Due to the heterogeneity of the sample, it was understood to present the data through a general analysis and an analysis of subsamples, whenever necessary, namely samples by sport, function, gender or type of contract (professional or amateur).

Table 8 - Inquired Distribution by sport

Sports	%
Handball	23,05
Football	20,34
Futsal	18,98
Judo	9,83
Volleyball	5,42
Basketball	5,09
Hockey	5,09
American Football	3,39
Athletics	2,37
Pingo Pong	2,03
Triathlon	2,03
Sailing	0,68
Racewalking	0,34
Swimming	0,34
Shooting	0,34
Snooker	0,34
Taekwondo	0,34

Qualitative sampling

The semi-structured interviews focused on 26 men and 2 women (a female football player and a sailor);

Most of the interviewees were athletes/players (42,86%);

The most represented sports were football (28,57%), futsal (21,43%), handball (17,86%), while 14,29% of the respondents were Olympic athletes.

Table 9 - Inquired Distribution by function/sport

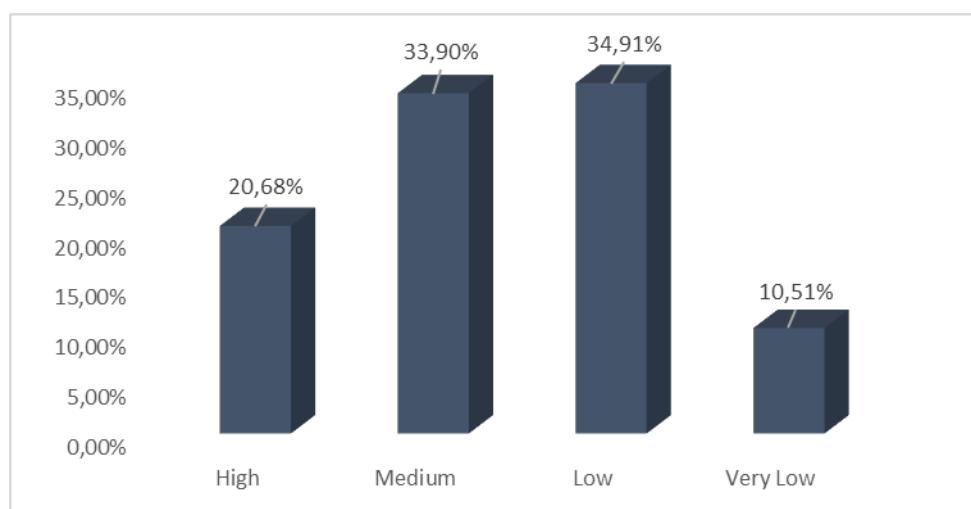
Function	Sport (n. ª)				
	Handball	Football	Futsal	Hockey	Other Olympic Sports
Player	1	1	3		
Former Player		1		1	
Athlete					4
Former Athlete					1
Coach	3	1	2	1	
Former Scouts		2			
Manager/staff	1	1	1	1	
Former Referee		2			
Journalist	n.a	n.a	n.a	n.a	n.a

4.3.3 Findings

a) Low probability to be discovered and difficulty in building the burden of proof

Naturally, a sports actor only can report a match-fixing situation if he has knowledge of it. At this level, only 21% of the quantitative sample considers that there is a high probability that a sports actor will be discovered after manipulating a result. On the other hand, almost half the quantitative sample (45,42%) believes that the probability of finding a case of match-fixing is low or very low.

Figure 23 – Probability of a sport actor to be discovered after fix a match



It is curious to see that the odds of being discovered increase in professional sports. In this case, 62,38% believe that there is a high or medium probability of discovery. On the contrary, the percentage is 48,94% in amateur sport.

Table 10 – Probability of a sport actor to be discovered after fix a match

	Professional Sports Actors	Amateur Sports Actors
High	27,52%	10,64%
Medium	34,86%	38,30%
Low	25,69%	40,42%
Very Low	11,93%	10,64%

Conversely, when we analyze the data by function, it is verified that the fear of being discovered is greater in the referees/judges. Almost 70% consider there is a high or medium probability of being discovered. This is the class most targeted by public opinion and is continually under suspicion, something that can help explain the data obtained. Coaches are the ones who show less concern.

Table 11 – Probability of a sport actor to be discovered after fix a match

	Referees/Judges	Athletes/Players	Managers/Staff	Coaches
High	31,43%	20,51%	29,73%	10,45%
Medium	37,14%	38,46%	24,32%	26,87%
Low	28,57%	27,56%	37,84%	53,73%
Very Low	2,86%	13,46%	8,11%	8,95%

For the sports actors interviewed, the difficulty in collecting evidence that proves the occurrence of match-fixing constitutes the greatest obstacle to their discovery. The performance evaluation of a referee, player/athlete or coach focuses on subjective criteria, so it is difficult to associate an error committed with a case of match-fixing. Consequently, the lack of objective evidence blocks supposed irregular and illegal situations from being reported.

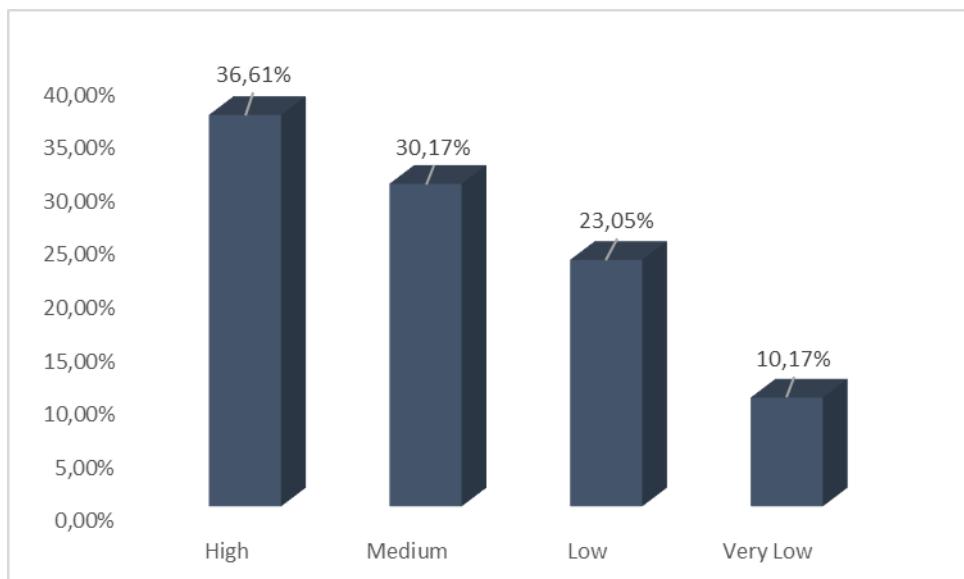
"It is very difficult to understand if the player has made a mistake or not ... There is a lack of real truths, real facts that guarantee a player can have a negative sport performance on purpose ... by our experience we can see that certain situations are far from normal, but still so ... it's very difficult to identify."
(Futsal Coach, 1st Division)

"If I hear rumors of what goes on in other groups, I will never report without evidence." (Director of Futsal, 1st Division)

- b) The sense of impunity retracts the act of reporting

If the involvement of a sports actor in a match-fixing case were discovered, respondents considered that the possibility of punishment would be high. However, there is still a certain sense of impunity by a third of the sample. It should be noted that the results obtained in this project are similar to those of the AMATT project, giving weight to the idea that there has been no improvement in relation to the sense of impunity.

Figure 24 – Possibility of punishment if a match-fixing case is discovered



The impunity perception is quite disparate between professional sports actors and amateur sports actors. While 45,87% of the professional sports actors consider that there is a high possibility of punishment in case of discovery of involvement in manipulation of results, only 29,79% of amateur sports players have the same opinion.

Table 12 – Possibility of punishment if a match-fixing case is discovered

	Professional Sports Actors	Amateur Sports Actors
High	45,87%	29,79%
Medium	26,61%	29,79%
Low	18,35%	30,85%
Very Low	9,17%	9,57%

On the other hand, the referees/judges, athletes/players, managers/staff and coaches, present different perceptions regarding the sense of impunity. In the case of referees/judges and athletes/players, respondents who consider that there is a high possibility of punishment (48,57% and 44,23%, respectively) represent more than twice as the coaches who share the same opinion (17,91%).

These data are particularly interesting and can indicate the existence of "weak classes" within sports.

Table 13 – Possibility of punishment if a match-fixing case is discovered

	Referees/Judges	Athletes/Players	Managers/Staff	Coaches
High	48,57%	44,23%	27,03%	17,91%
Medium	25,71%	28,85%	29,73%	35,82%
Low	22,86%	20,51%	24,32%	28,36%
Very Low	2,86%	6,41%	18,92%	17,91%

The evidence collected in the semi-structured interviews helps to better understand the reason for the sense of impunity that tends to exist in sport. According to the actors interviewed, this feeling is assimilated as a set of attempts or effective manipulations that are reported and end without consequences. Emotional exhaustion, bureaucracy and time spent may also retract future reports.

"During the week, I have been informed that two players were encouraged to fix the match. Before speaking to the president, I spoke to them separately. They confirmed that they had received a call from a restaurant owner who offered money to fix the match ... they had the phone number of the person and they knew who he was ... he was a club member of the opposing club ... The case was reported to the judiciary police and they advanced to court. The newspapers didn't even mention the case ... Although there was evidence of a call and there were witnesses, no one was convicted at the trial." (Former Football Scout, at that time football coach in the 3rd Division)

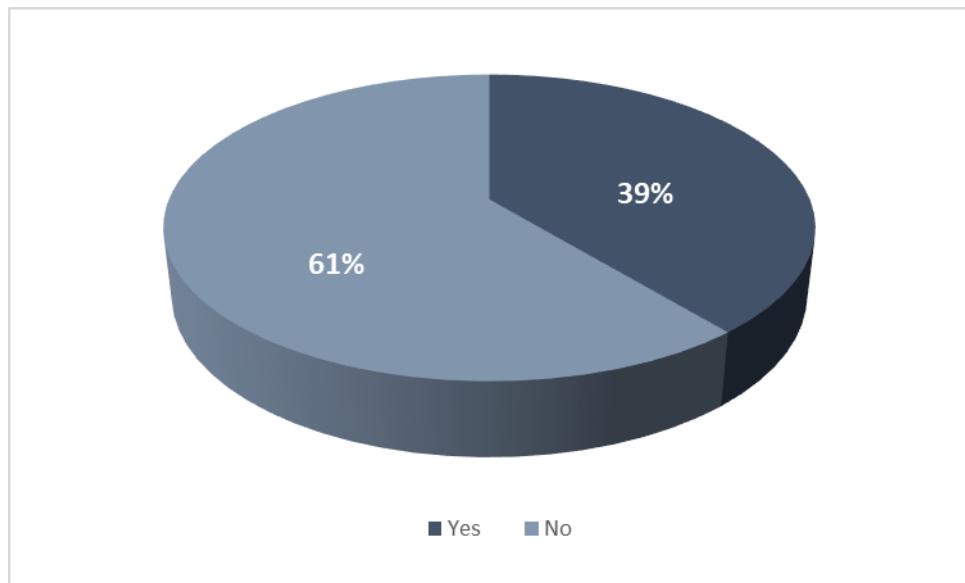
"There is a lot of reluctance to report. The report could have several consequences ... it would be word against word and we would not gain anything from this ... This kind of situation happens everywhere (reference to an approach to fix the match)." (Football Club President, 3th Division)

- c) Sports actors are aware of existing protected reporting systems to report safely and effectively... but rarely report

As mentioned previously, the federations and the COP have been carrying out prevention, training and education actions among sports actors. One of the purposes of these training actions is to disclose safe and effective protecting reporting systems.

The information-sharing strategy appears to be working, as about 40% of the quantitative sample reveals they are aware of existing protected reporting system to report safely and effectively any suspicious, or irregular and illegal behaviors. The percentage of amateur and professional sports actors who know this type of reporting system is very similar and stands at 40,37% and 41,49%, respectively.

Figure 25 – Percentage of sports actors that are aware of existing protected reporting systems to report safely and effectively



It should be noted that in football and futsal, the percentage of sports actors who are aware of existing protected reporting systems almost reaches 50%. This predominance is reinforced by the evidence collected in the semi-structured interviews. Of the twenty-eight sports actors interviewed, eight admitted having knowledge of the existing protected reporting systems, to report in a safe and effective manner. All these sports actors hold positions in football and futsal.

The data collection reveals the efforts the main Portuguese football institutions have been carrying out.

The Portuguese Football Federation (FPF) and the Professional Football Players Union (SJPF) have created a digital platform, integridade.fpf.pt (Integrity Platform), designed to report and combat match-fixing.

In addition, the FPF, the SJPF and the Portuguese League (LP) have been conducting match-fixing prevention sessions, where they disseminate the integrity platform.

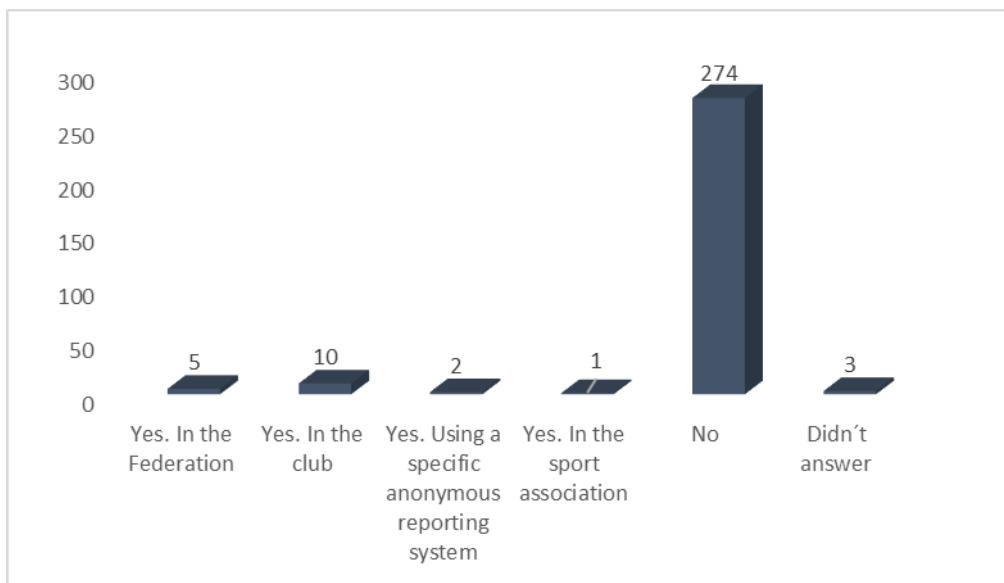
According to the FPF, in 2017-2018, "more than 3.200 sports agents were alerted to this scourge in 78 formations that included all the clubs participating in *Liga NOS* (Premier Football League), *Ledman LigaPro* (2nd Football League) and *Liga Sport Zone* (Premier Futsal League)."

By the end of the season 2018-2019, all clubs participating in the *Liga Revelação* (under 23) and part of the clubs of the *Campeonato de Portugal* (3th Football Division) will receive awareness actions on match-fixing.

However, the data show that there is still work to be done. Although the sports actors are aware of existing protected reporting systems to report safely and effectively, they rarely denounce. According to the quantitative data, only 7,12% of the respondents admitted having reported a case related to match-fixing.

Typically, the complaint is made internally at the club. Only two sports actors admit to having reported through a specific anonymous reporting system.

Figure 26 – Have you ever reported any case related to match-fixing?



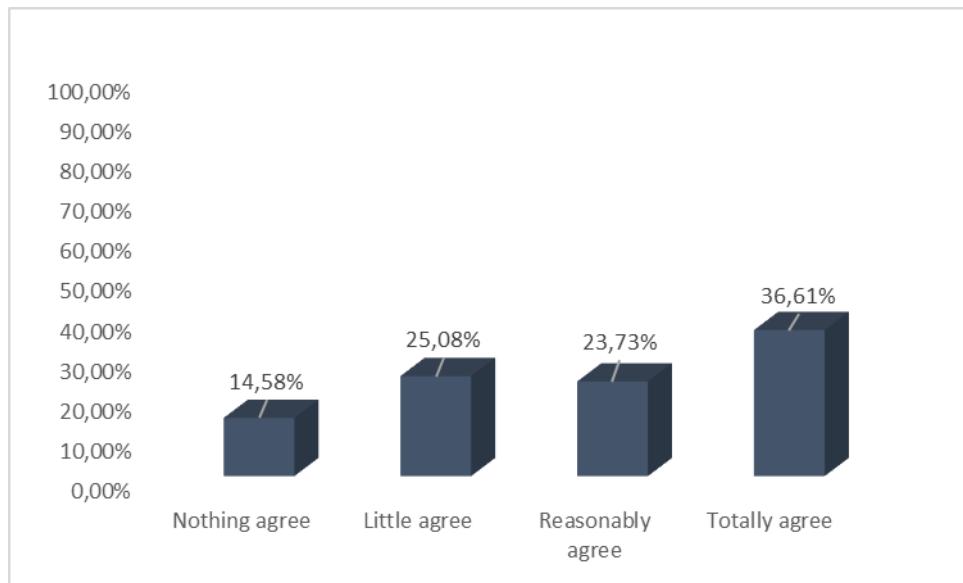
The respondent's opinions corroborated the data collection. According to the qualitative data, the sports actors prefer to solve internally eventual cases of match-fixing, avoiding exposing the group.

"If I was aware of a match-fixing case I would report ... I could not expose the player publicly, but I could not keep him on the team. I would lose confidence. I would report to the club and then the club would deal with the process. "(Handball Coach, 1st Division)

"About 8, 9 years ago, we dealt with a case of a foreign player who ingested drugs. Not in order to improve performance, but in a social perspective. There was an anti-doping check and we heard about it. In 2 days, that player was on the plane to return to Brazil. Nor do we expect counter-analysis or justification, nor disciplinary proceedings ... we solved the case internally. It was only publicly known 2 or 3 months later. "(Director of Futsal, 1st Division).

Although the results presented in the previous figure show little desire of the sports actors to report irregularities and illegalities, about 60% of the respondents said that a sports actor of their sport always reports any attempt to match-fixing. In this way, there seems to be a contradiction between what a sports actor thinks his colleagues do and what he and his colleagues effectively do. The fact that the sports actors recognize that match-fixing is something wrong, and that the socially correct thing to do is to denounce, may justify the discrepancy of the results.

Figure 27 – An actor of my sport (athlete, coach, manager/staff, referee/judge) will always report an attempt to fix a result



The sports players interviewed recognize that the complaint is the most appropriate act, whenever they become aware of a case of match-fixing. However, the complexity of the decision to denounce can lead to several types of personal questions that end up conditioning your decision.

"Suppose I won a game where the referee was bribed? I'll report? It is very beautiful for those who are not in the system. All the members of the club would say that they would kill me and my family. It would end up being discovered who denounced it. I would never have a job in Portugal again. "(Former Scout, 1st Division)

The upcoming evidence helps to clarify the different types of personal questions that sports actors face.

d) The code of silence exists and is a common practice in national sports

One of the reasons usually given for the low percentage of match-fixing reports is related to the existence of a code of silence. This happens when sports actors keep silent about irregularities, immorality and even illegalities, that occur in a sporting context.

According to the quantitative data, this practice exists in national sports and is practiced more by fear (55,25%) than to protect the interests of the group (22,03%). Only 13,90% of respondents considered that this practice doesn't exist.

Figure 28 – Reasons for the practice of the code of silence



About half of the sports actors interviewed (53,58%) admit that there is a code of silence in sport, being that half (21,43%) represent football.

Only three players (10,71%) from futsal claim, linearly, that there isn't any code of silence in sport. The remaining 42,87% suggest that they, or their club, don't accept this practice, without ever extrapolating this vision to the overall sport.

Regarding the group of actors that admits the existence of the code of silence in sport, the reasons pointed out by them are diverse and vary from class to class. According to the sports actors interviewed, this code is practiced by athletes, clubs, referee councils, sports federations and by some media.

The Olympic athletes practice the code of silence, essentially, for the fear of sporting reprisals. These actors are aware of various irregularities and illegalities that occur in their sport, but the punishments applied to athletes who reported in the past affect the prospect of new reports in the present.

"It happens, sometimes, that federations do not support the best athletes. The best athletes have already been banned from competing in some sports. Whoever speaks the truth about the sports federations ends up being handicapped. "(Olympic Athlete)

In collective sports, the code of silence can be practiced by the players, or by the club. When it is practiced by the players, the problem emerges and is solved among them. When it is practiced by the club, the problem is treated internally to avoid making it a matter of public knowledge for the public opinion

and/or to the competent entities. The fact that clubs in certain situations prohibit players from speaking to the media can also be seen as a kind of code of silence.

"When I played, if any problem happened, it was solved internally. Only if we could not solve it between us did we talk to the coach. "(Handball Coach, 1st Division)

"The administration would be informed and would address the situation. We would try to avoid exposing the situation to the media. "(Handball Director, 1st Division)

"Players should be allowed to speak. Clubs do not allow players to talk because they are afraid that players will talk about wages arrears, or other internal problems. "(Former Journalist)

The referees are one of the most protected classes in Portugal. This is the conclusion from the speech of two former football referees. Other sports actors, from other sports, support this view. Marginalization by professional colleagues, or the classification given by observers, are some of the conditioning strategies for those who rebel against the "system." There were also reported cases in which the reporting of an irregular situation caused the suspension of the whistleblower.

"In football, silence makes law! The access to the top of a career is increasingly stratified and conditioned. As such, it doesn't matter to any referee report. If you do it, quickly you will be marginalized and have a conditioned career. "(Former Football Referee, 1st Division)

"After having reported corruption, I was suspended. I reported the secretary of the league of clubs ... who at the time asked me to fix a result ... I was ostracized by the direction of the league, by the secretary of the league and by the president of the referee council. "(Former Football Referee, 1st Division)

In sports federations, the code of silence is imposed through reprisals. According to the Olympic athlete respondents, the federations have an exaggerated power and it is up to them to decide which athletes are supported and which are not. There are testimonies of athletes who are no longer supported and are prohibited from competing in certain sports, for speaking up against irregularities committed by the sport federation.

"Criticism of the federation is not well-regarded. Federations have an exaggerated power over their skills. They have power over athletes, teams, who support and who don't support, about sports equipment,

whether they practice or not practice, who trains them and how they train them ... a certain athlete, by the way the best national athlete of his sport, stopped being supported by the federation because she decided to speak to the newspapers. "(Olympic Athlete)

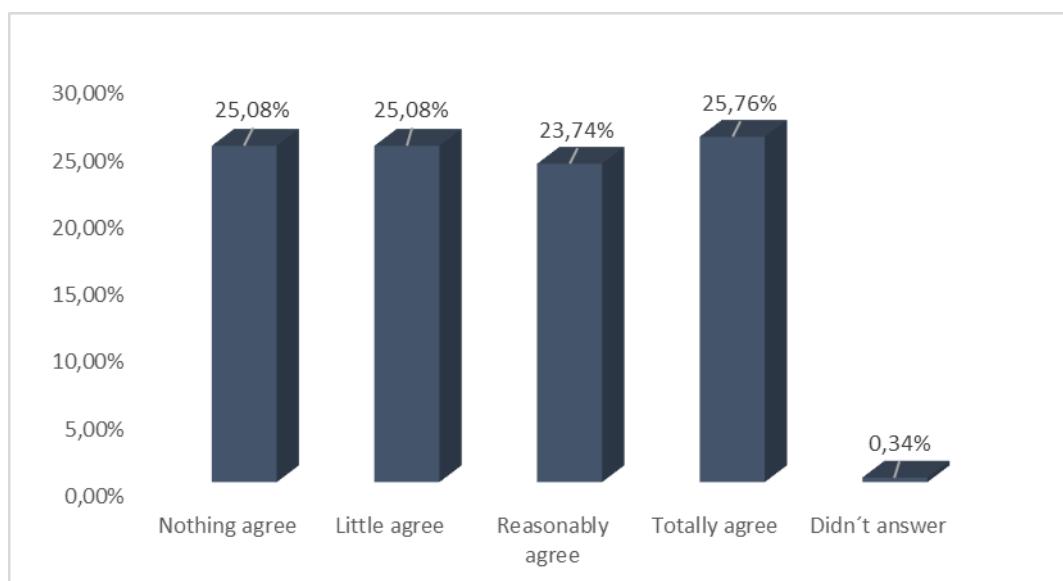
In journalism, the code of silence is manifested by club and political interests. This is the opinion of a former journalist who says that there are pressures to not mention specific issues, or to misreport information and to communicate only what matters.

"Today, newspapers are communication tools for clubs and political parties. Only what matters should be published. In the past, I have often felt internal pressure not to publish certain news. Since I was already a journalist with a longer career, I had no problem ignoring the pressure and publishing the news nonetheless ... the younger journalists wouldn't be able to do the same. "(Former Journalist)

- e) Reporting is dangerous and could harm our sports career

Approximately half of the quantitative sample (49,50%) believe that reporting match-fixing in Portugal is dangerous and can harm the sports career of those who do it. At this level, there seems to be no difference in perception between professional and amateur sports actors, given that 50,46% and 51,06% of the respective actors agree totally, or partially, with this premise.

Figure 29 – Reporting match-fixing in Portugal is dangerous and can harm the sports career of those who do it



The referees are the class that is most afraid of the negative sports consequences that the complaint entails. 65.71% of the referees reasonably or totally according to this. The fact that the referees are the class

where the hierarchy can exert more influence and generate more dependence, can help to explain these results. Referees, unlike managers, coaches, or players, can't change club or country to perform their work elsewhere. For the other professional classes, the data are very similar, although the coaches exhibit a percentage of total agreement that is relatively lower than the other categories.

Table 14 – Reporting match-fixing in Portugal is dangerous and can harm the sports career of those who do it

	Referee	Athletes/Players	Managers/Staff	Coaches
Nothing agree	20,00%	26,28%	24,32%	25,37%
Little agree	14,29%	25,00%	27,03%	29,85%
Reasonably agree	40,00%	19,87%	21,62%	25,37%
Totally agree	25,71%	28,21%	27,03%	19,41%
Didn't answer	0,00%	0,64%	0,00%	0,00%

The analysis of qualitative data shows that the danger of reporting, and the consequences thereof, are directly related to cultural and institutional issues that characterize the respective sports federations, associations, or clubs. As such, in the same sport, depending on the club, the marginalization of a sports actor can either occur because he reports an irregularity, or because he compacted with an irregularity and didn't report.

"Our group would marginalize those who manipulated, not who reported." (Handball Director, 1st Division)

"In hockey, clubs don't pay very much. In the case of city council clubs, it is common practice for the club to hire the player and offer a job in parallel to the sporting activity. Imagine that the player reported someone from that club. It would be unthinkable. He would be dismissed from the team position and from the job. "(Hockey Coach, 1st Division)

In football, the actors are unanimous in saying that reporting is dangerous and can have negative consequences, not only for the sports career, but also for the physical integrity. Institutional powers or professional dependency (most of the sports players do not have another profession) are the main reasons pointed out.

"I would not get work anywhere for the rest of my life. It's like gangster movies. I couldn't even change my name. There isn't possible solution. "(Former Scout, 1st Division)

"I have no interest in reporting. I know these kind of situations happen. If I want to be part of the game, I must adapt to them. The other option is to exclude myself and leave. Why shall I report? To harm myself?" (Football Coach, 3th Division)

Back to the statistic sample, the vast majority of respondents admit that love and respect for the sport, the need to protect the integrity of the sport, or the defense of ethics and Fair Play, are the three main reasons for reporting a manipulation of results. However, fear of the consequences and lack of confidence in the sports system end up conditioning their decision. Only 4 respondents stated that nothing would prevent them from reporting a manipulation of results in their sport, or competition.

Figure 30 – What are the three most important reasons that would motivate you to engage in whistleblowing to report a harmful irregularity in your sport?

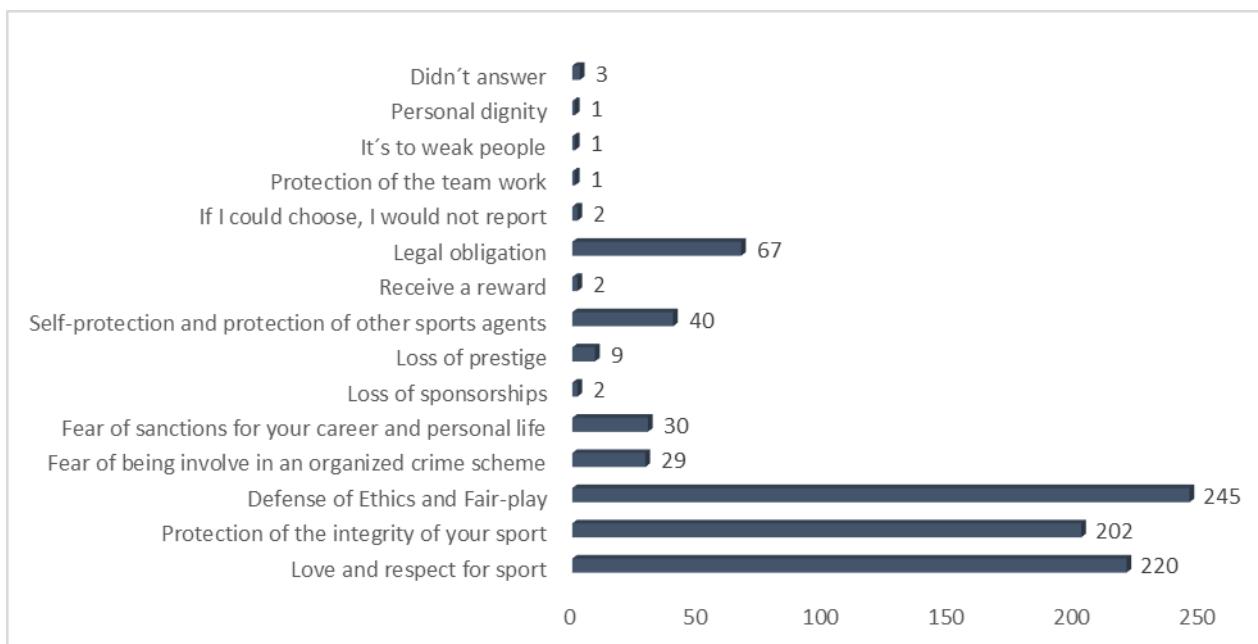
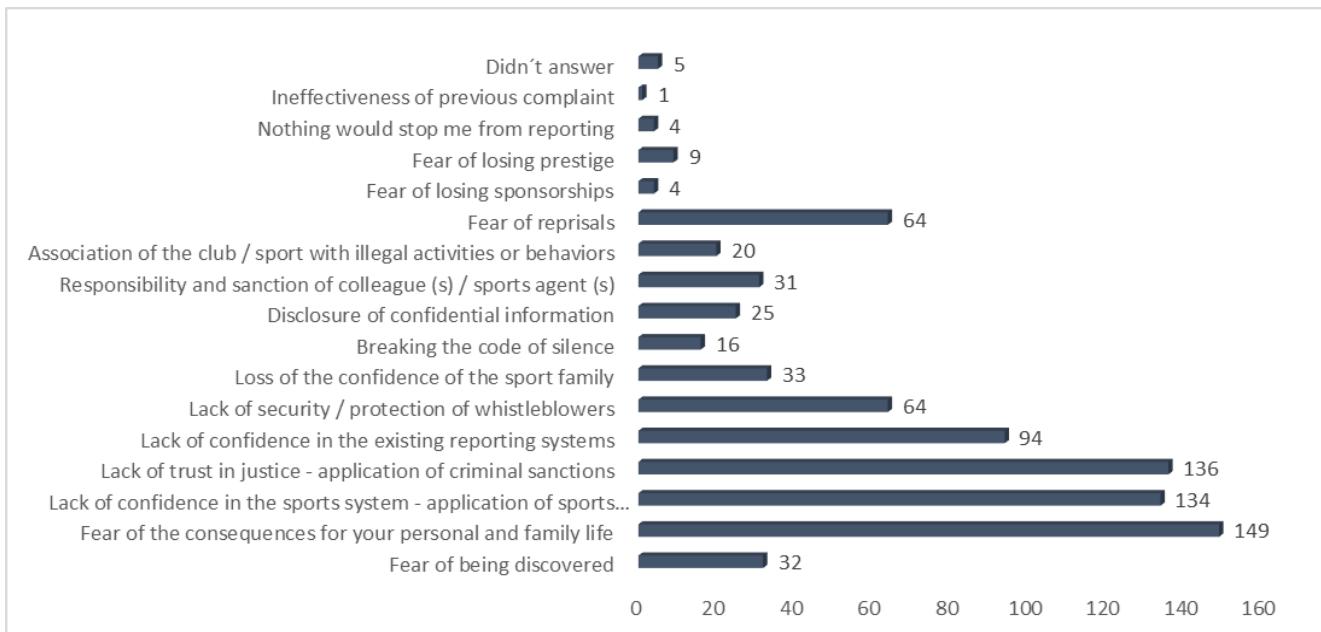


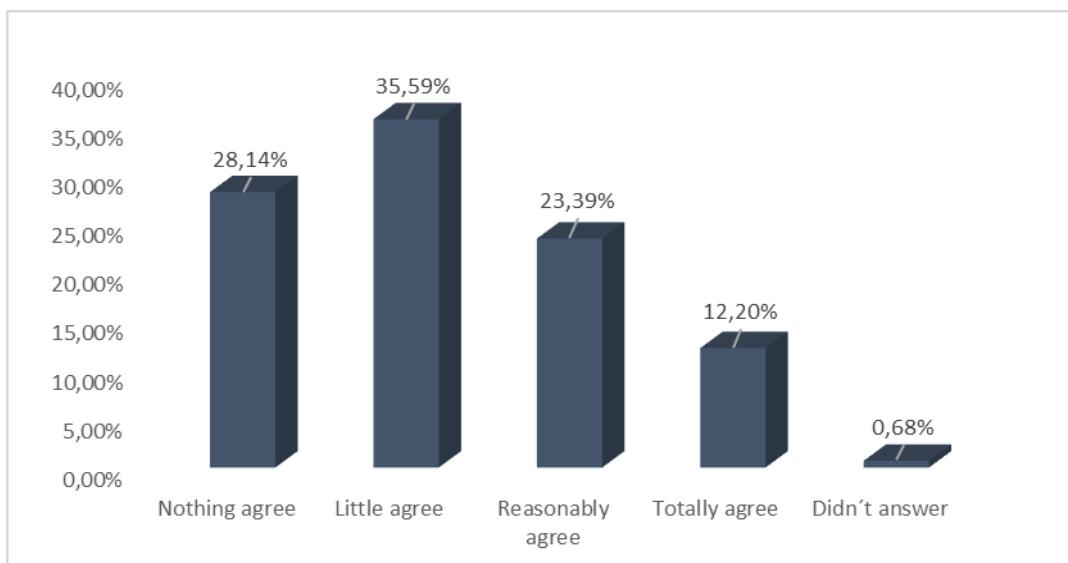
Figure 31 – What are the three most important reasons that would prevent you from engaging in whistleblowing to report a harmful irregularity in your sport



f) Need to improve reporting systems

Reporting irregularities and illegalities, especially in the sporting context that has been presented, is dangerous and, as such, requires the existence of safe and effective protected reporting systems. However, the majority of respondents (63,73%) do not agree that they have protection conditions so that they don't suffer retaliation in case of reporting match-fixing.

Figure 32 – Athletes/players, coaches, managers/staff, referees/judges have at their disposal conditions for protection, so that they do not suffer retaliation in case of reporting match-fixing



Athletes are those who most disagree with the existence of conditions for reporting safely. 72,73% don't believe they have at their disposal conditions of protection, so that they do not suffer retaliation in case of reporting match-fixing.

It is curious to note that in football and futsal the percentage of respondents who share this opinion drops to 53,45%. However, despite the creation of the Integrity Platform, most respondents still feel that the ideal conditions for reporting in safety are not yet in place.

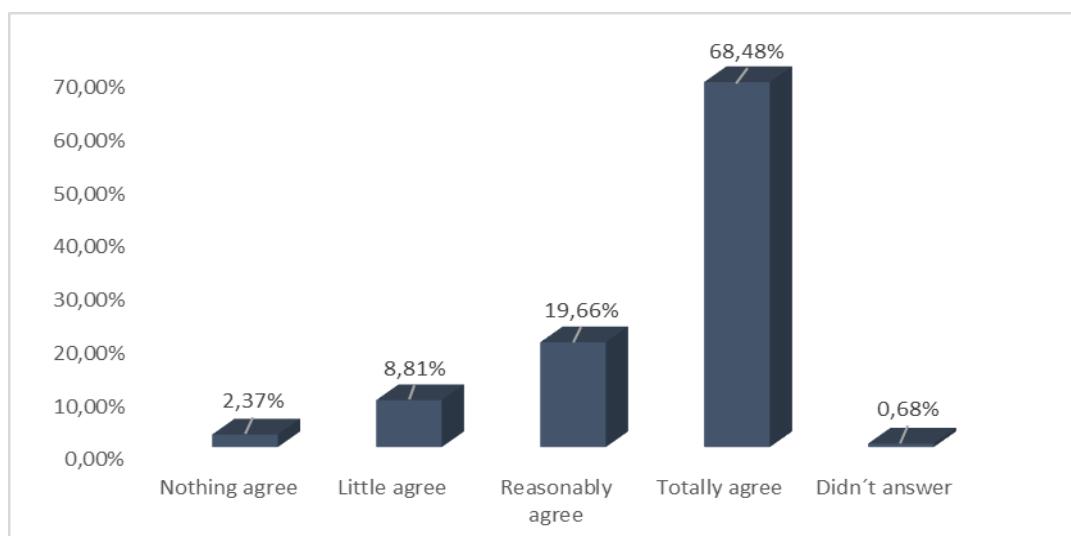
"Yes, I know the Integrity Platform. But we know that it is possible to identify, through the ID, where the complaint was made. Who is available to report, even anonymously?" (Former Football Referee, 1st Division)

Table 15 - Athletes/players, coaches, managers/staff, referees/judges have at their disposal conditions for protection, so that they do not suffer retaliation in case of reporting match-fixing

	Athletics and other sports	Football/Futsal
Nothing agree	32,73%	27,59%
Little agree	40,00%	25,86%
Reasonably agree	20,00%	27,59%
Totally agree	7,27%	18,10%
Didn't answer	0,00%	0,86%

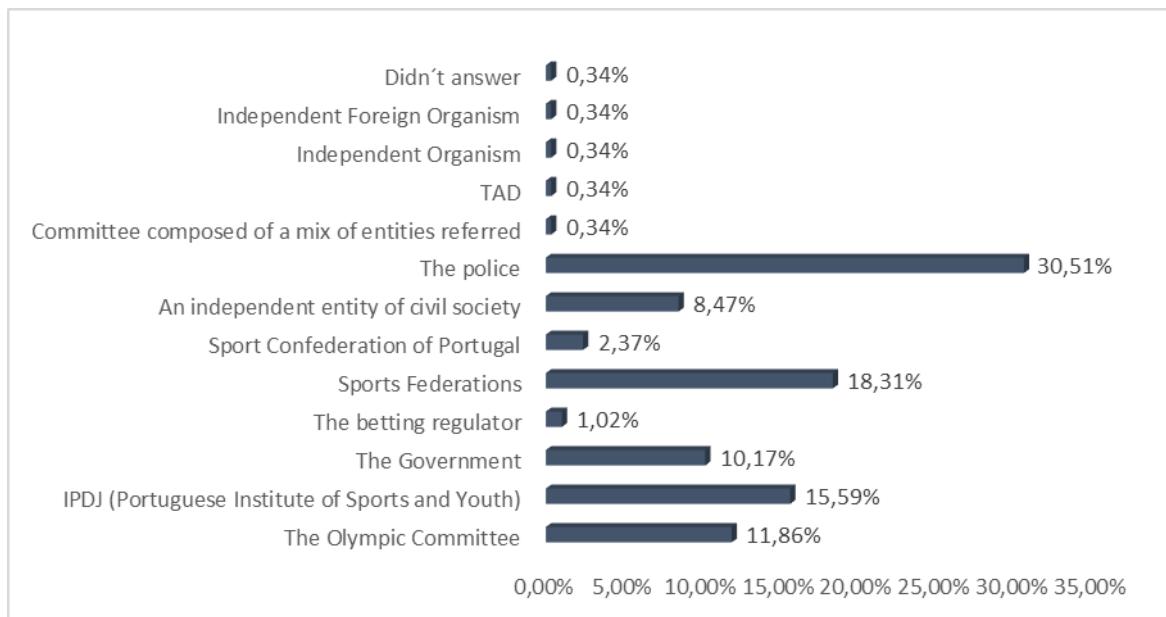
Consequently, it is not surprising that the vast majority of the quantitative sample (88,14%) (and also the qualitative sample) recognizes that, in order to combat the manipulation of results in Portugal, it's necessary to ensure the existence of a more secure and efficient protected reporting system, that guarantees anonymity.

Figure 33 – In order to successfully combat match-fixing it is necessary to create an effective and secure protected reporting system



As such, the judicial police are the entity that has the broadest consensus to manage a protected reporting system that guarantees the protection of whistleblowers reliably, safely and efficiently. In professional sport, federations are seen as an equally valid option (22,94% opt for federations and 24,77% for judicial police).

Figure 34 – Who do you think should manage an integrated protected reporting system in order to be reliable, effective and secure?



4.4 Slovenian report

4.4.1 Scope of the research and methodology

The main object of this research is to tackle main threats to the integrity of sport, such as match-fixing. The research is part of the bigger international project T-PREG. Firstly, with the research, we aim to show current situation on match-fixing in Slovenia, mainly through collected data from key actors and stakeholders from sporting world. Other partners within the project are from Portugal, Italy, Belgium, Spain, and specific European institutions. Analysis of the situation further indicates potential issues regarding match-fixing and corruption in Slovenian sport, particularly in football. Secondly, in the framework of the ongoing private and public policies and actions against match-fixing, goal of this research is to strengthen their effectiveness through training related to corruption and match-fixing in sport and through different possible models of protected reporting system. Both goals simultaneously outline and integrate many other objectives, such as: increasing awareness about match-fixing, better understanding of private and public policies and actions against match-fixing, developing a tailored training model to combat corruption and match-fixing in sporting world, strengthening the cooperation between different institutions and stakeholders etc.

Methodological approach in this paper is based on primary data (questionnaires and interviews) and secondary data (literature). Primary data was collected through sending 159 questionnaires to Slovenian athletes that come from football clubs and conducting semi-structured interviews with athletes, former athletes, former referees, coaches, former scouts, officials and former journalists.

While in the case of questionnaires, that present quantitative survey instrument, it has been developed and implemented in the past in Italy by Catholic University of Milan. Sound practice of previous work has been used as a model pattern that declined to different national peculiarities and needs. Quantitative data have been collected with help of an online platform (managed by Coninet SpA). Working phases were as follows:

1. September – November 2017: Questionnaire development and comparisons between partners
2. December 2017: Implementation of online platform
3. December 2017 – February 2018: Data collection

Results from quantitative research are presented as diagrams and descriptive analyses and correlations. We need to mention important remark about unanswered questions by respondents that are included in the research, showing potential reasons either of their non-cooperation, ignorance or simply

misunderstanding of question. Latest is represented as “missing” data which is in most cases subsequently analyzed as equal to other collected data.

Qualitative research is focused on reporting system in Slovenia and is discussed in the last subchapter of the results and findings. Regarding interviews, we used a classical data collection technique called snowball sampling (Cohen and Arieli, 2011) where each interviewee suggests new contact(s), who can speak openly about the subject. Interviews were conducted with already mentioned key target group. More detailed, they are divided in two groups:

1. Institutional actors:

- 4 institutional actors (including sport federations, law enforcement institutions, civil society organizations)

2. Sport actors:

- 4 sport actors (players/athletes, referees, managers, scouts, sport officials, retire players and other stakeholders (journalists);
- Most respondents were aged between 21 and 35 years;
- 1 discipline: football
- Some of the respondents have played/were active in football in several countries

This publication is combining project research and classical report. In such way, it fulfills need of academic sphere as well as politics. In last instance, the focus is on recommendations that offer several ideas to consider and fight corruption and match-fixing in sport at the national level.

4.4.2 Introduction and Background

Corruption in sport is not a new phenomenon; stories dating back to ancient Greece and Rome have provided numerous accounts of actual and potential corruption within the sporting arena. Examples include the statement on the epitaph of Diodoros from Amisus who outlined the ‘cunning treachery of the *summa rufidis*’ (similar to a boxing referee) (Robert, 1940) and the games arranged by Gelon of Syracuse (Pausanias, 6.13.1; Pindar, 1).

More recently accounts of corruption involving FIFA officials and World Cup bids have been flooding the headlines (Lawton, 2011). Recent international conventions such as the United Nations Office on Drugs and Crime (UNODC) resolution against corruption in sport and the United Nations convention against corruption have all contributed to the international fight against corruption. Despite the great advances in the area of anti-corruption in the past 100 years the issue remains to this day. There has been much debate on why exactly this is. Suggestions put forth by numerous sources include, among others, reasons of power, control, money and many more. More than this, there have been numerous varying recommendations as how to best tackle these issues in sport each of which work to differing degrees. Yet much of the extant

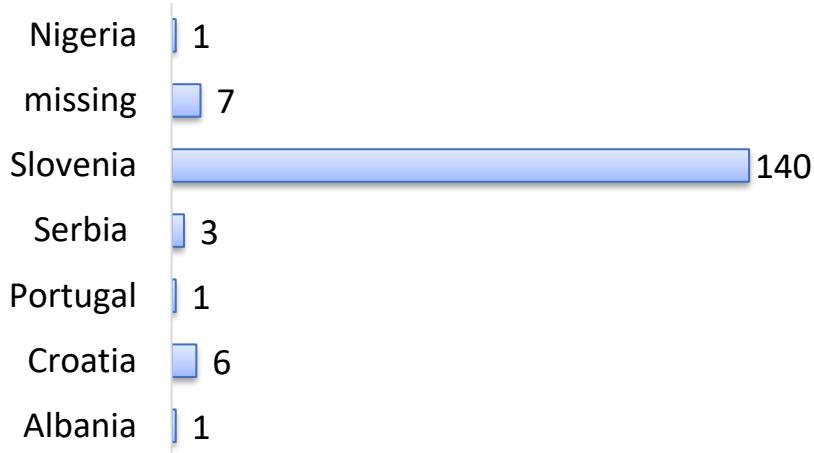
literature and research into the area relates to either international and general approaches which fail to take into consideration regional specifics or rather these are approaches that are specifically suited to the country performing the research, for example the United States. Such research and the recommendations found within have little relevance to the specific situation in Slovenia. As such, the point of this research was to investigate the situation of match-fixing as it may exist in sports in Slovenia today. This was performed to provide a more detailed image of the specific situation within the country in the hope to be better able to provide detailed recommendations with specific relevance to the unique arena that is Slovenian sports.

4.4.3 Results and Findings

Composition of Respondents

To begin with, a look at the composition of the respondents indicates that the vast majority (88%) are of Slovenian nationality. This is particularly useful as it enables a more overarching understanding of the specifics relating to Slovenian sports, and more specifically football in Slovenia (100% of respondents were from football).

Figure 35 - Nationality of respondents



a) Education and Sporting Norms

To begin with, it is important to understand the structural norms in place within the football community in Slovenia. This can be performed through reference to the questions outlining the longest and shortest periods a player is contracted to a particular football team; next figures paint a very vivid image of the situation. Players rarely remain in a team for a period shorter than 2 years and are almost certain to remain contracted to the team for more than 5 years. This is important because it indicates two things, 1) over 5 years, the team's culture is likely to become intrinsically embedded in the player, such that it will play a big part in their decision making and behavioural decisions, and 2) loyalty to the club seems to be a major

part of Slovenian football. Both of these points are particularly important for this research, as they are factors which could influence the likelihood of a player becoming corrupted. In the case of the former, if the team culture has a particularly low level of ethics, this will be passed onto the player and in the case of the latter, a player may be more willing to engage in unethical behaviour due to reasons of loyalty and protection of the team which they hold dear.

Figure 36 - Shortest Period in a Team

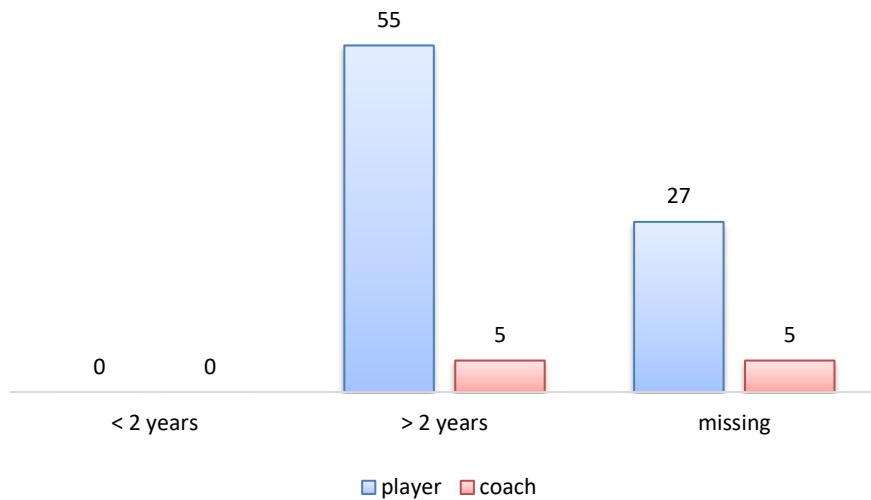
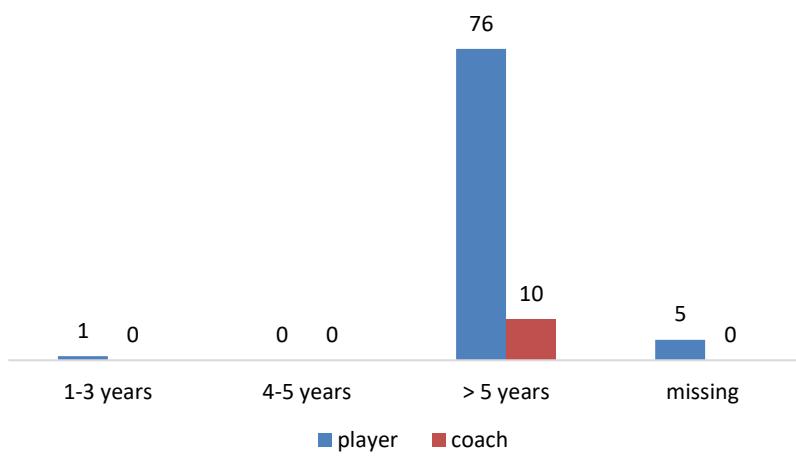


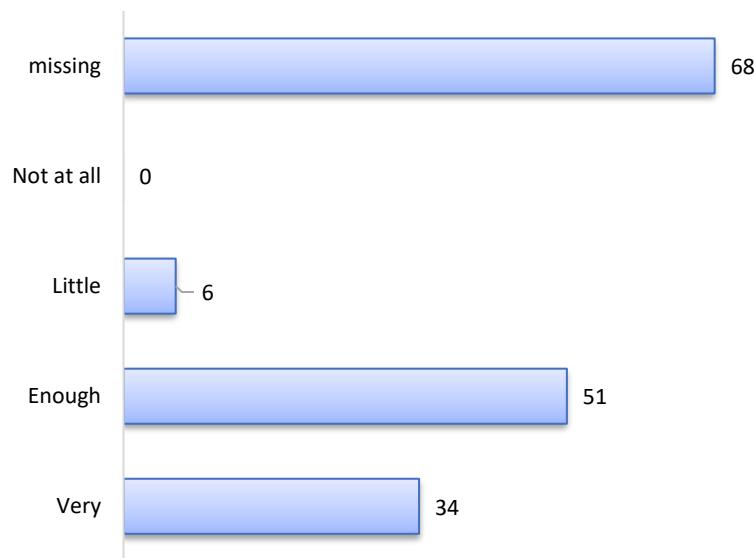
Figure 37 - Longest Period in a Team



It should, however, also be noted that these loyalty indicators may actually be less due to a sense of loyalty from the players, but may instead be a consequence of the economic situation present in Slovenia. To elaborate, Slovenia whilst one of the most successful and economically advanced nations that once made up the former Yugoslavia has historically had some issues with unemployment and difficulties getting work. As such, some football athletes may feel that this situation is still present and therefore accept the work they can get. Job security, as such, is an important element of Slovenian culture and this may play a part in the

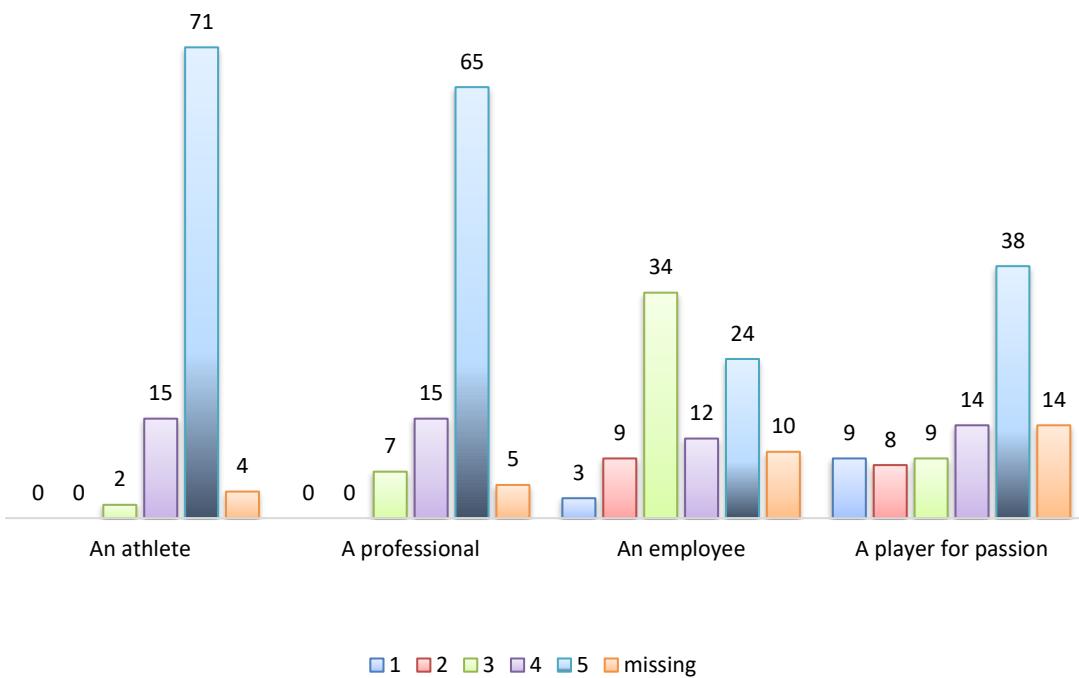
athlete's decision to remain in their present club for fear of limited choices. If this is the case, then it opens them up to even more potential corruption, as this fear can significantly influence decision making (March, 1994; Crișan, Pană, Vulturar, et. al., 2009). One possible indicator of this element may be seen in the responses to the question 'how satisfied are you with your work?'

Figure 38 - At the moment, how satisfied are you with your work?



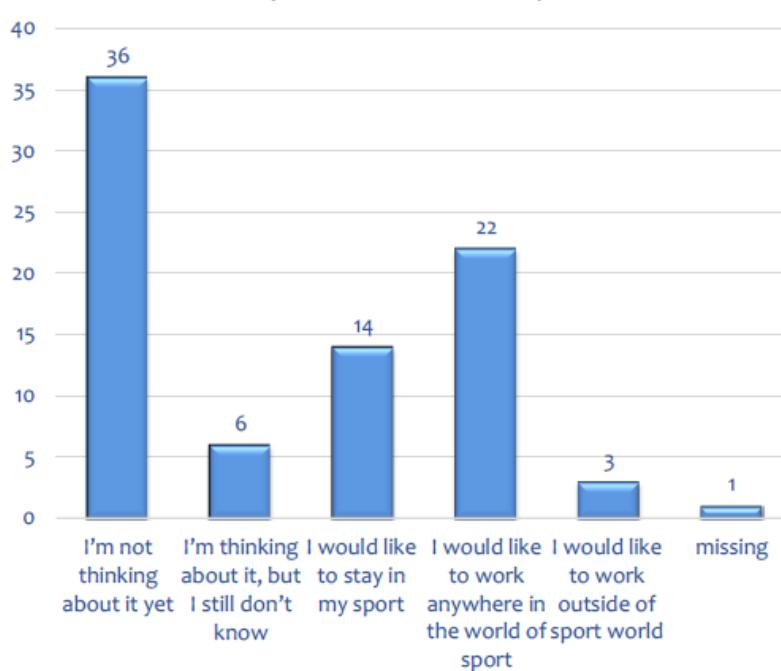
There are two interesting elements revealed here. 1) Less than $\frac{1}{4}$ of respondents (21%) were very happy with their current work. This again is likely inflated because some respondents may fear that their answers will somehow get back to their employers. Similarly, many responses are missing; this could potentially indicate that many athletes are very unhappy with their current working arrangement. This would seem to indicate that their affiliation with the club is more out of necessity than desire. They may love being athletes, but feel that their options are limited and therefore take that which they can get even if they are not happy. This is further supported through the respondents' views of themselves as depicted in the figure below.

Figure 39 - To what extent do you consider yourself (only for players and staff members)



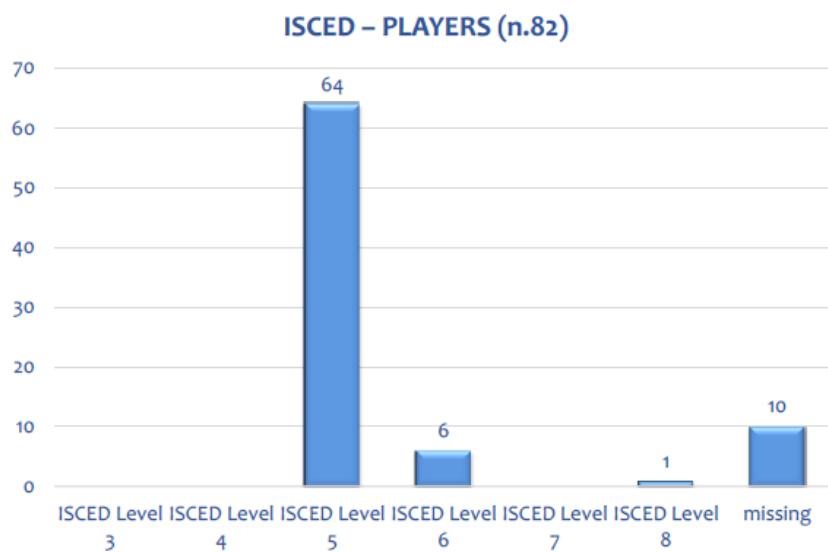
It is clear from this question that most respondents view themselves as primarily professional athletes, however, the interesting point is that more than 1/3 (44%) of respondents that provided responses to this question also feel that they are employees. Similarly, 1/3 (33%) felt that they were not particularly a player for passion. This denotes that for at least 1/3 of respondents' sport is just a job, nothing more. This has major implications for behaviour and decision making, and may lead to an increased likelihood of unethical behaviour, a sort of win at all costs attitude. Perhaps these athletes are not satisfied because they expected more from their career, that they would prefer to be playing at other more prestigious clubs outside of Slovenia and this therefore also is likely to influence behaviour. In either case it demonstrates some of the factors influencing why so many of the respondents seem unsatisfied with their work. As such, it seems necessary that more opportunities need to be opened up for athletes in Slovenia in order to increase workplace satisfaction and moreover this could have a positive impact on reducing the rates of corruption within Slovenian football. As such, the promotion of dual career options may be a powerful tool in fighting corruption in Slovenia. To elaborate on this point one can refer to figure 40.

Figure 40 - At the end of your sporting career, which kind of profession do you think you could take up?



Whilst a majority of respondents have given their future some thought, most remain uncertain, having responded with either 'not thinking about it' or 'still do not know'. When this is coupled with the information relating to educational background a picture begins to emerge.

Figure 41 - Educational situation of responding athletes

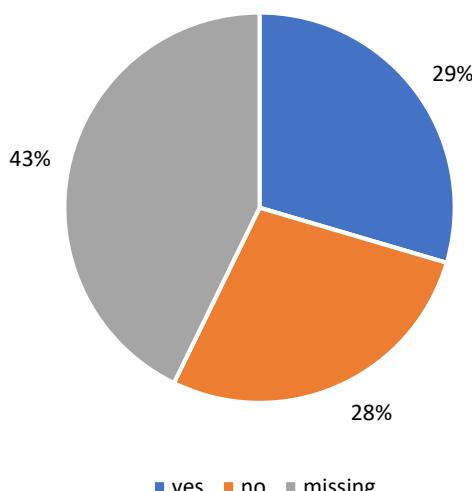


As can be seen most athletes are only in possession of a short cycle higher education certificate (practical), whilst this does not exclude the possibility that at least some are attempting to obtain a bachelor, the reality is the demands of professional sporting life may well prevent or limit their chances to obtain it.

has become the case in the modern world that a bachelor degree is, in many cases, the minimum necessary education for careers in a number of fields. The dual career program has been acknowledged by many international bodies, sporting associations and think tanks, as being vital for assisting athletes ensure a minimisation of the risk factors associated with corruption. Similarly, many international guidelines and reports outline the importance and benefits of the dual-career system (EU, 2012). More than this, the opportunities opened up through obtaining a university degree means that athletes are likely to be more satisfied in their workplace because if they are dissatisfied, they may be more willing and able to seek alternative employment. Moreover, if athletes have workplace alternatives, they are less likely to simply follow the demands of others, for example if officials in the football clubs demand certain unethical behaviour. Similarly, the opportunities provided through university degrees can also result in greater career options after ending a player's career, thus they may feel reduced economic pressure to engage in match-fixing or other forms of corruption as their financial security is not reliant on their playing career. Finally, by obtaining a university degree (at least a bachelors) one would also hope that graduates are also trained in various soft skills and capabilities including decision making, critical thinking and to some extent ethics. In such cases this would have a positive effect on their playing careers and decision-making approach to their sport, thus potentially reducing the likelihood of engaging in corrupt behaviour. However, this would require universities to introduce courses in ethics, anti-corruption, anti-doping, etc. for athletes to participate in during their degree. Therefore, such courses need to be designed and implemented as part of degree programs, particularly in sports faculties.

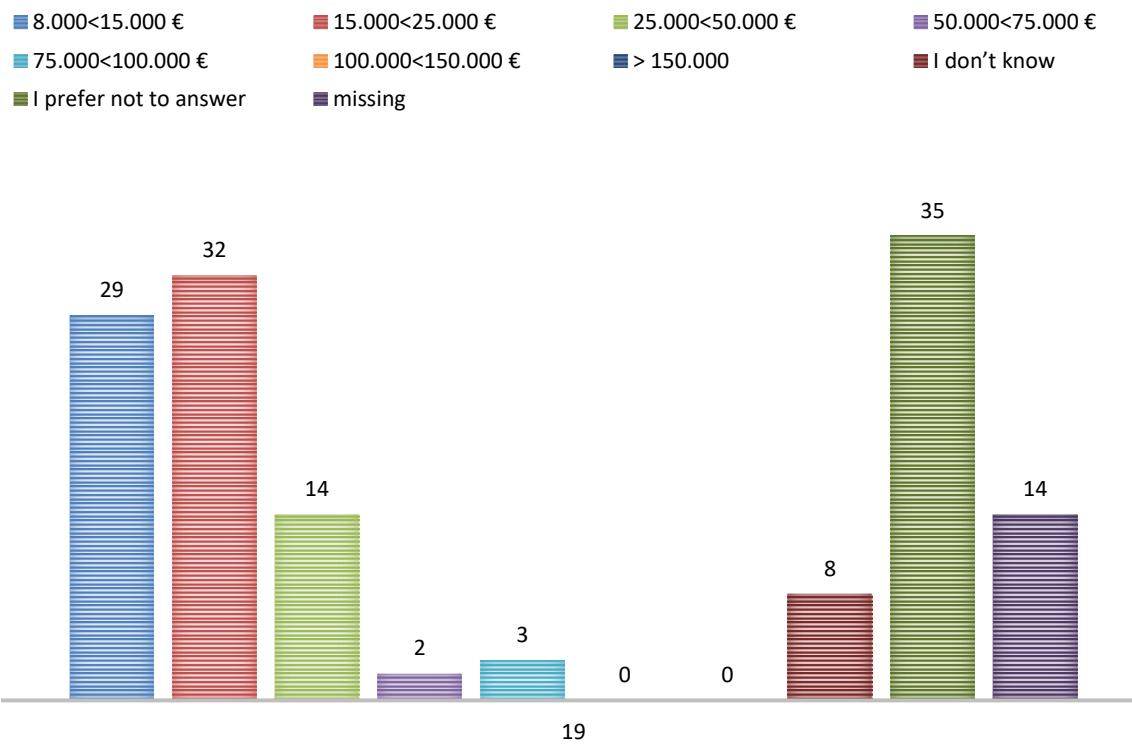
Evidence of the impacts of the lack of higher education in many athletes can be seen in the responses relating to the question about anti-corruption clauses in a player's contract.

Figure 42 - In your professional contract, have you ever signed a clause related to the consequences of being involved in Match-Fixing?



It should be pointed out that across the globe it is the norm that players' contracts contain clauses relating to match-fixing and/or corruption. Two very worrying conclusions can be derived from these responses. The first relates somewhat to the before mentioned lack of higher education. A very large proportion (the largest group) of respondents did not answer the question. This could be because of two reasons, either 1) they do not want to say because of fear that their actions do not necessarily coincide with the clauses in their contract (that is to say perhaps they are engaging in corrupt practices and do not want to assist in being caught), or 2) they honestly do not know. In either case this is worrying, but in the latter this could be evidence of a failure to read their contracts. This could be because they did not care what it says they just want the job they were offered, alternatively they trusted someone to read it for them (perhaps family, coach, lawyer etc.) or simply they did not understand what they were signing. Each of these three possibilities are concerning and education could help mitigate these possibilities. This finding is further supported with reference to the question relating to income.

Figure 43 - Player income



Whilst not a particularly high percentage (only about 7%), there are some athletes who do not know their income. Furthermore, it is reasonable to assume that at least some that did not complete the question may be in a similar position (this is perhaps one reason they did not respond to the question). A similar scenario may be the case for those that responded with 'I prefer not to say'. The fact that some athletes do not know their salary is worrying. This implies that some athletes at least may not be aware of what they are signing or doing, and are completely under the control of a third party e.g. family member or another 136

member of their club (e.g. manager/coach), thus again reinforcing the finding that some athletes will do anything to become a professional. This creates a dangerous set of factors which could lead to an increase, not only in rates of corruption but also doping etc. The athlete does not know what they are doing, but simply follows someone they trust. This is further proof for the need of education in early life to help create good decision makers, critical thinkers and ethical athletes.

There is another concern with regards to the results in figure 42. If it is true that more than $\frac{1}{4}$ of football contracts do not contain a match-fixing clause, then what does this say about the club in question? It would seem to indicate that they do not care about match-fixing. Does this mean they do not care because they do not feel it is a threat (in which case this simply ignorant)? Or do they not care because they are happy if their players engage in corrupt acts so long as they do not get caught? So even if some athletes do not know what they are signing, at least some of the missing responses will likely include athletes that have contracts without such clauses. Such a widespread practice in Slovenia is cause for concern, and as such, it is necessary to implement new national laws, policies, and frameworks on the composition and form of player contracts (such as the required inclusion of match-fixing clauses). Whilst the implementation of nationwide standards and regulations will not in itself eliminate match-fixing they will in part go towards creating further legal ramifications for the practice and may hold club teams somewhat more accountable thus hopefully reducing the likelihood. Such laws and policies will also add a level of protection for both the clubs and players should issues of corruption arise during their career. At the very least, such regulations of standardised inclusions would scare some athletes into avoiding match-fixing and one would hope also contribute positively to their decision-making practices.

If one is to then investigate who athletes may rely upon to aid in their decision making, an interesting picture is painted. Next Figure outlines the primary actors to whom athletes turn to for advice and guidance, thus playing a role in an athlete's decision-making processes.

Figure 44 - Please indicate from the following the key people that you trust and consult

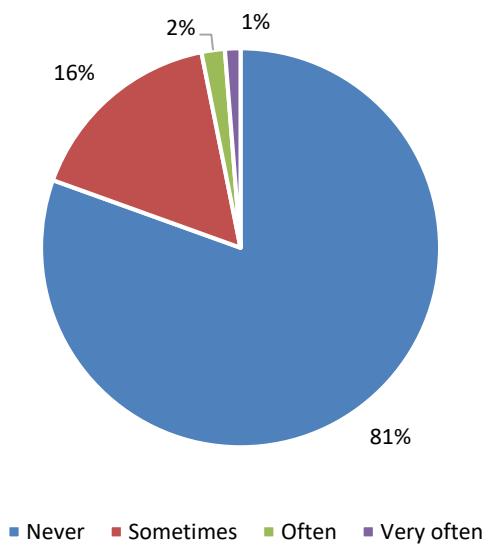


There are a number of revelations from the answers provided to this question. Firstly, it would seem that very few athletes rely on friends when it comes to advice. Whilst the wording of the question may have caused confusion for some (such that team-mates are in a number of cases also friends), the number of athletes responding with friends from outside my sports is very low. This would indicate that anti-corruption training for the wider public may not be the most efficient use of resources with regards to influencing athlete behaviour. On the other hand, a majority of athletes answered with parents, family and relatives; those in their close circle of trust and relationships. This paints a very interesting picture. Family are the primary source of ethics and decision-making tools during the early development of a child (Vitell, Nwachukwu & Barnes, 1993; Cote, 1999). This influence is likely to continue during the early years of their sports training. That is to say there is a direct link between decision making, ethics, and corruption between an athlete and their family. This would seem to indicate that ethical training and anti-corruption courses would be more effective if they were also provided to family members of athletes. Similarly, important but less surprising is the role of team-mates and coaches/trainers. When an athlete joins a team, it is reasonably expected that they will at least occasionally turn to their coach or other team mates for advice, as this is normal behaviour amongst humans, to turn to those in a similar situation and with experience. What this does, however, mean is that the team culture and moral standards will be core in influencing the behaviours and actions of an athlete. As such, a team which believes that ethics are irrelevant, a team that focuses on the win at all costs etc. will likely continue to create players with the same outlook and decision-making issues. As such, it is clear, and a widely held practice that ethical/moral and anti-corruption training also needs to be focused towards the team, not only the players but all stakeholders. This should not only focus on managers, coaches, and trainers, but also incorporate doctors, masseuses, etc., for these actors also have an important role in

the psychological wellbeing of the athletes and are often turned to for advice, for they have a trust-based relationship with the players.

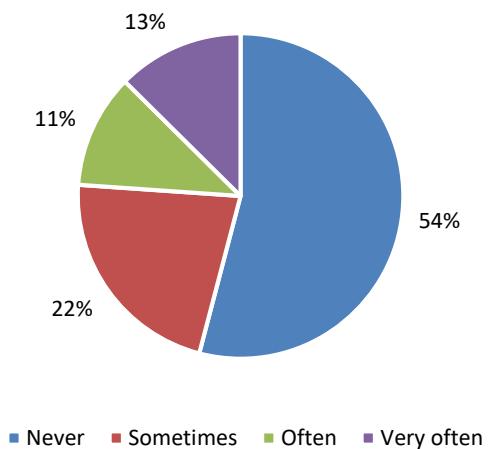
There is further evidence to support this worrying trend of athletes potentially not knowing their legal obligations or what they are signing. In most players' contracts around the world it is a requirement of professional sport that athletes do not place bets. Despite the fact that betting on sports is banned for professional athletes the responses to the question 'do you bet on sports?' a concerning trend emerged, that some athletes still engage in it.

Figure 45 - Do you bet on sporting events?



Yes, it is true that a majority of respondents indicated they never do, at least some of these are likely to have misrepresented reality. The fact that there is almost 1/5 of athletes that do engage is concerning. This implies one of two things: they do not know they cannot do this because they simply signed the contract without reading it or just trusted their coach/manager who may have advised them to just sign it, or alternative is that they know they cannot bet, but simply do not care, nor do they care if people know they are doing it. This implies a total contempt for authority and rules, and a complete lack of ethics. Alternatively, this may also imply maybe there are cases of contracts in Slovenia that do not forbid betting, in which case this is another major problem that could be addressed by a standardised or regulatory requirement for players contracts. Next Figure extends this image and investigates betting in an athlete's inner circle.

Figure 46 - Does anyone of your inner circle bet on sporting events?



The question does not elaborate on what constitutes inner circle, this may include other athletes, friends or family. However, in the case of other athletes, the concern is obvious and potentially indicates a wider spread practice than may be otherwise revealed. In the case of family this is again quite a concerning trend because of the importance athletes placed on family members in their decision making and advice. If family members are placing bets on sporting matches, then they may be more inclined to exert influence on the athletes to 'help' ensure results that earn them money. Basically, the position of trust that exists between athletes and their family could be abused. As such, it is further support for the importance of education aimed at the family of the athletes, this education should ensure not only that they pass on these positive decision making tools and moral choices to the athletes in their family, but it may also reduce or remove the likelihood of betting on sports, thus removing one of the potential risk factors associated with match-fixing.

b) Organisational Culture

Given some of these revelations, it is therefore necessary to also investigate the organisational culture present within the team, as it is from within that trust relationships are built and from within that many risk factors can arise. This is difficult to undertake, as many elements of an organisation's culture are intangibles, there are, however, a number of tools available to better understand these elements. It is possible to obtain somewhat of an image from the questions asked in this survey in particular the role of internalisation within the team. Internalisation is the extent to which it is expected that issues and problems within the team are handled and controlled internally. Figure 47 depicts the actions an athlete would take in problematic situation.

Figure 47 - If you found yourself in a situation where you found out about Match-Fixing, how would you behave?



As can be seen, less than half (35%) stated they would report it to the proper authorities. There are a number of issues with this. Firstly, it is reasonable to expect that at least some of the respondents will put down a response that they expect is the 'correct' answer, so in this case 'report it to the proper authorities'. Secondly, proper authorities differ from team to team, sport to sport, and country to country. It could be the case that proper authorities are in fact certain members of the club itself. In any case it seems that a large percentage of the athletes are likely to report it to an appropriate internal source, be this the coach, manager, team-mate etc. The question that remains is whether this is a club requirement, an internalisation of the problems or something that is an athlete specific approach. In either situation it would seem that the organisational culture of the club plays a significant part in influencing the behaviour of the athlete. Given this, again it is important that anti-corruption training and education needs to be focused on all stakeholders within the club. Furthermore, a set of national policies and rules governing reporting would again aid in the reduction of these problems. More worryingly, this seems to potentially indicate a code of silence may be in effect within football in Slovenia. That is to say, any issues affecting the club must be handled in private and without involving external stakeholders. This is even more concerning in situations where there is a general lack of ethics and morals of club members.

c) Player Perceptions, Mindsets and Ethics

It is also necessary to understand the internal workings of the athletes' responding to the survey, how they see the sporting world in which they operate and their part in it etc. Two particularly important questions in this regard are depicted in figures 48 and 49.

Figure 48 - Compared with the past, do you consider Match-Fixing?

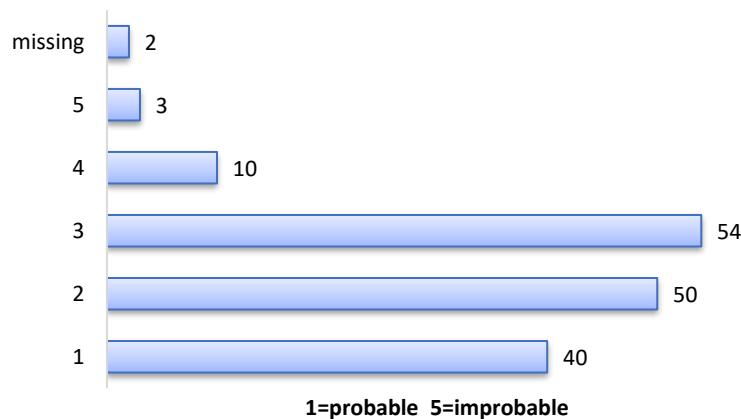
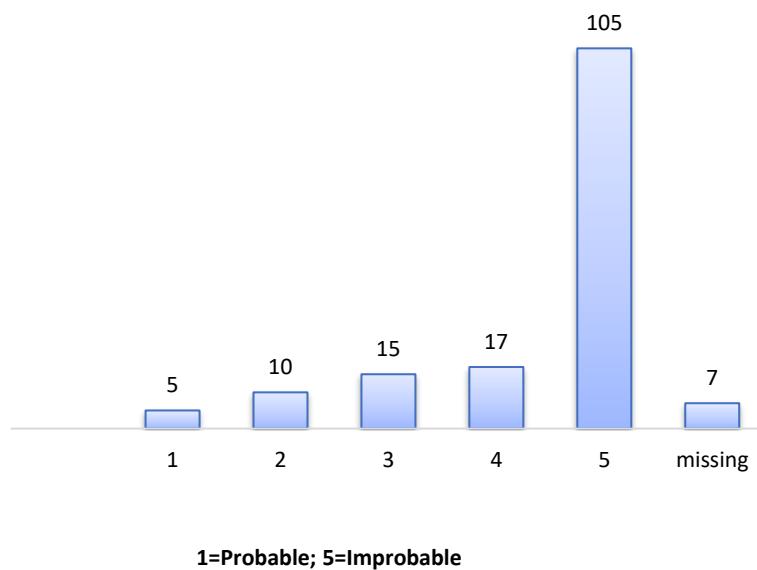


Figure 49 - Currently, to what extent do you think there is a probability of being involved in Match-Fixing?

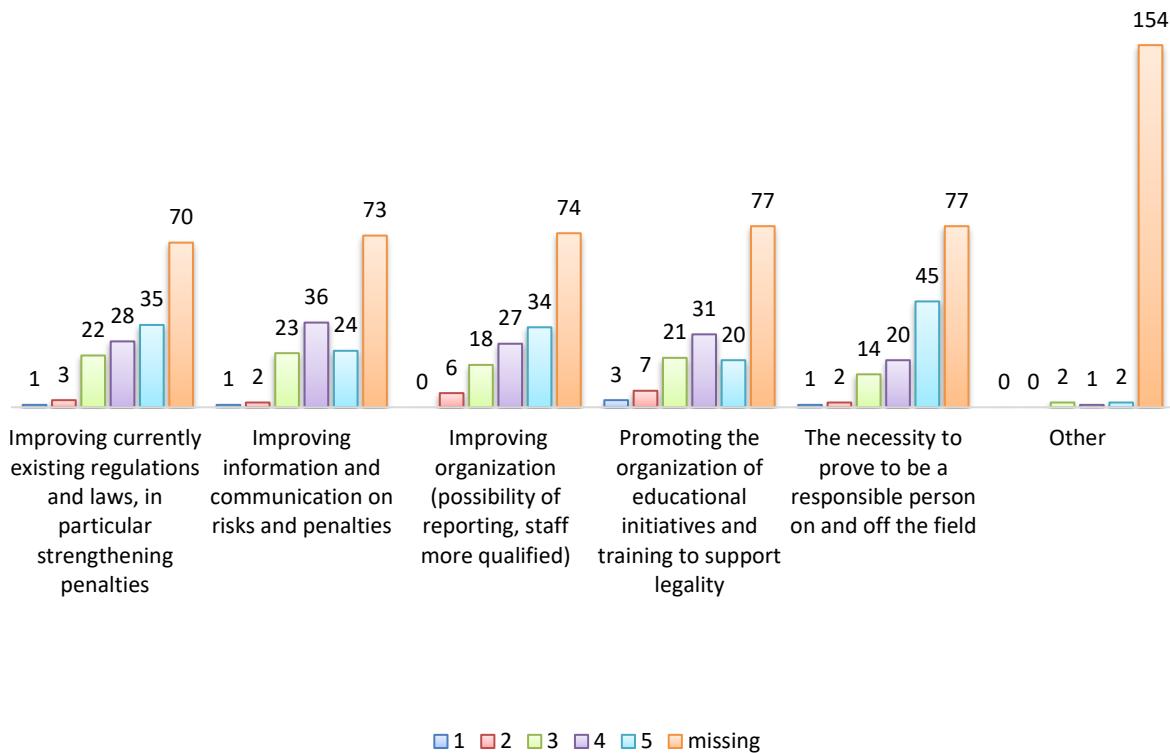


Firstly, from the responses in figure 48 it is clear that athletes feel that match-fixing is a problem of the sporting world. This is to be expected if athletes have any understanding of the world in which they operate or have even been to a basic training course. More worrying are their responses to the question in figure 49. Of those athletes which responded to the question more than 2/3 (69%) believed match-fixing is not something that affects them. This could potentially indicate a few different concerning trends: 1) Athletes

believe they are invulnerable, that they are in charge of their playing careers and cannot be corrupted. 2) Athletes care so little about ethics that they do not see match-fixing as something that would concern them, they will simply do as they want. 3) They actually believe that their club will protect them from any such problems and provide the necessary organisational support should the need arise. Or 4) They have received little to no training and education on the matter and as such are unaware of the possible risks. It is therefore necessary to dissect each of these possibilities separately. Firstly, if athletes do see themselves as invulnerable and incorruptible, then this is a concern, for this likely means that they are unprepared to tackle offers of match-fixing or bribes should they come. They may be unprepared for the temptation; this therefore indicates more education is needed. Secondly, if it is a lack of ethics, then this is of course a concern as it may indicate that match-fixing and corruption is taking place and athletes simply do not care (for more on this argument see later), again the necessary response is ethical training during childhood and the period of early sports training. Thirdly, they may actually believe they are protected by their club, this could account for some of the club loyalty. More than this, in the cases where corruption is revealed, perhaps the clubs have policies that they will handle it internally thus eliminating the athlete's responsibility. This therefore adds to the discussion relating to a code of silence and internalisation of problems. This issue would better be solved through the before mentioned frameworks and national policies for sporting clubs. Finally, what if the athletes are simply oblivious to the risks associated with match-fixing and the possible issues of corruption? This is perhaps one of the most worrying possibilities, for it is through education that athletes are better able to fight and recognise any problems around them. Therefore, again this indicates that greater education and training are needed in relation to match-fixing. More specifically training is needed on how to recognise corruption, how to respond, how to act, and how not to be corrupted. This education should not be purely theoretical in nature; it should contain practical, real life scenarios, and include mock situations where the athletes do not know that the person approaching them and bribing them is part of the course. The use of such examinations will provide a more accurate image of the situation and help show athletes the real risks associated with match-fixing. This again needs to start during the earliest years of an athlete's sporting life and training.

When the results of this question are put in context with the question relating to how match-fixing can be combated a more vivid picture of the issues in Slovenian football begins to arise.

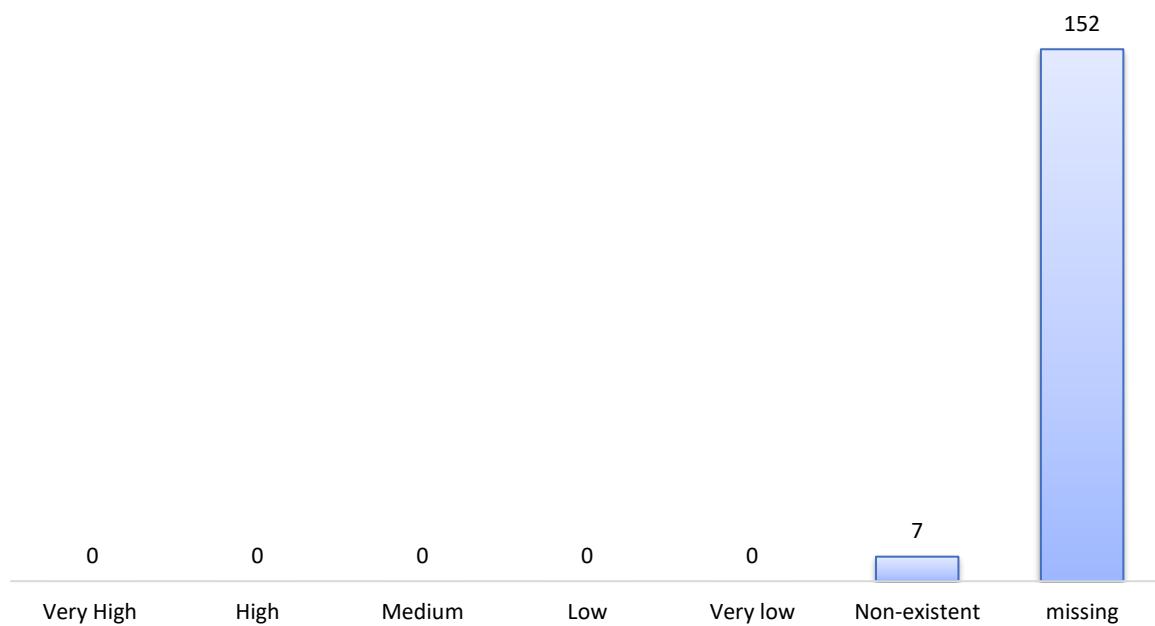
Figure 50 - According to you, to prevent and combat Match-Fixing what is needed?



Overall this question was basically unanswered by almost half of the respondents. In the case of 'other' almost all respondents failed to answer the question. The question remains, why is this? There are a few possible explanations, each more worrying than the next: 1) Athletes really are uneducated in what match-fixing and corruption are and simply do not know what can be done to combat it. This is a concern for the reasons outlined previously. 2) Athletes do not care enough to put any effort into thinking about the problem, they do not see it as something that affects them, so why should they bother to think about it, or alternatively it is not their job to tackle corruption, so why bother. This is a concern again because it helps to perpetuate the issues surrounding match-fixing and does not take into account the role of athletes in the problem. Finally, 3) Athletes or their clubs are engaging in match-fixing already and do not want to help solve the problem as it would limit their economic benefits and potentially lead to their discovery. This last possibility is the biggest concern for obvious reasons. This is feasible given the issues outlined previously about player awareness and education, their knowledge of their own contract, their stance on themselves as merely employees, the internationalisation of problems within the club, and the potential lack of club policies on corruption. All these aspects potentially point to a higher proportion of people and club engaging in match-fixing than revealed by extant statistics.

This final concerning possibility is further supported through a number of other questions in the survey, firstly, the question relating to ethics within sport.

Figure 51 - In your opinion, the actual (average) level of ethics and fairness in your sport is?



The results from this question are quite clear to see, 96% of respondents refused to answer the question, and the few that did indicated ‘non-existent’. This is very concerning because it potentially demonstrates that athletes feel there is no ethics in sport. What is more concerning is why they might feel this way. Is it because they see corruption all around them or is it perhaps because they are engaging in it themselves? The lack of answers to this question seems to indicate two issues, either they did not want to respond for fear that their employers would find out (and as such may be engaging in corrupt practices) or that the athletes themselves maybe engaged and do not want to draw attention to it. In either case this is further evidence that corruption may be more widespread in Slovenian football than previously believed and further investigations are needed to clarify this startling possibility.

To further elaborate on this possibility, figures 52 and 53 depict the respondents’ answers to the questions about athlete’s views on current match-fixing penalties and consequences for engaging in corruption, respectively.

Figure 52 - What do you think of penalties applied so far to those guilty of Match-Fixing?

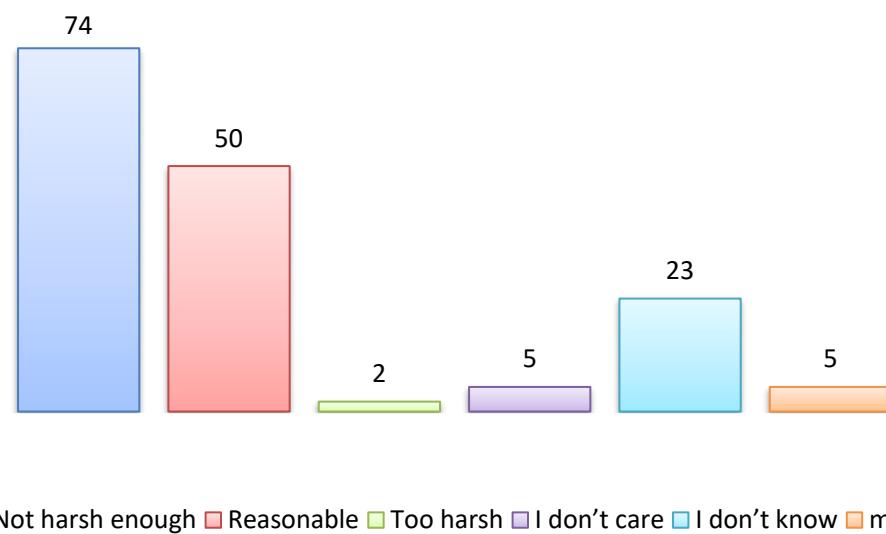
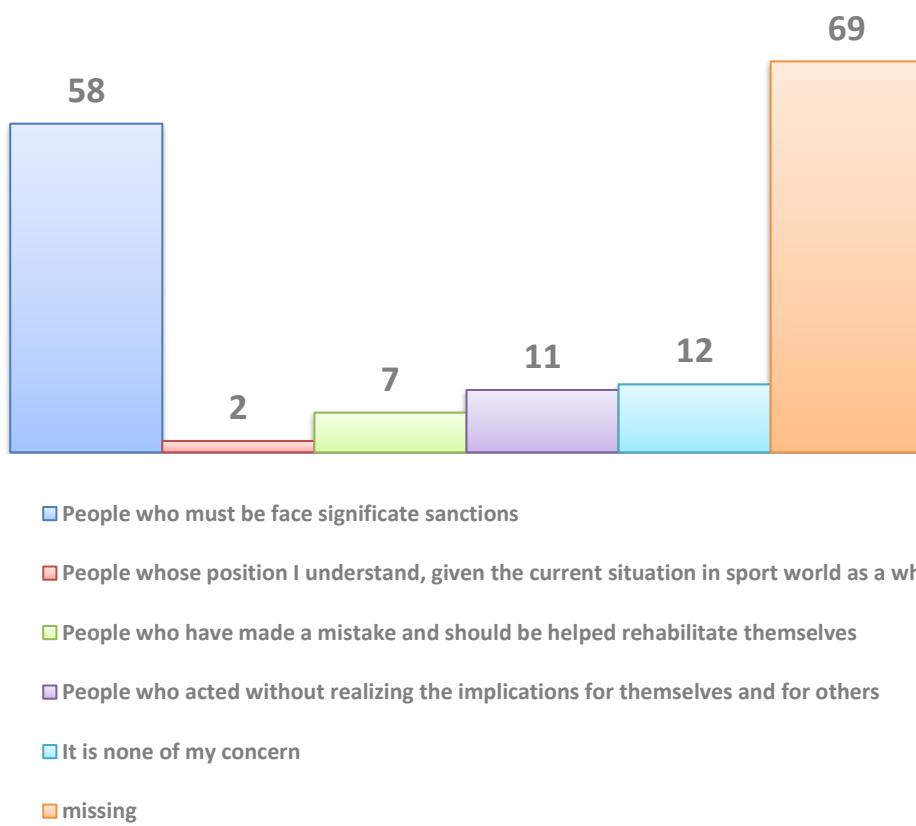


Figure 53 - What is your opinion of those that have been found criminally responsible because of their involvement in Match-Fixing cases aimed at altering the results of some matches?



With regards to figure 52, three of the previous findings are further supported. Firstly, by far the most responses related to the belief that penalties are not harsh enough. Almost half (48%) believed that current penalties are too mild. This may well be because the respondents are aware of more significant levels

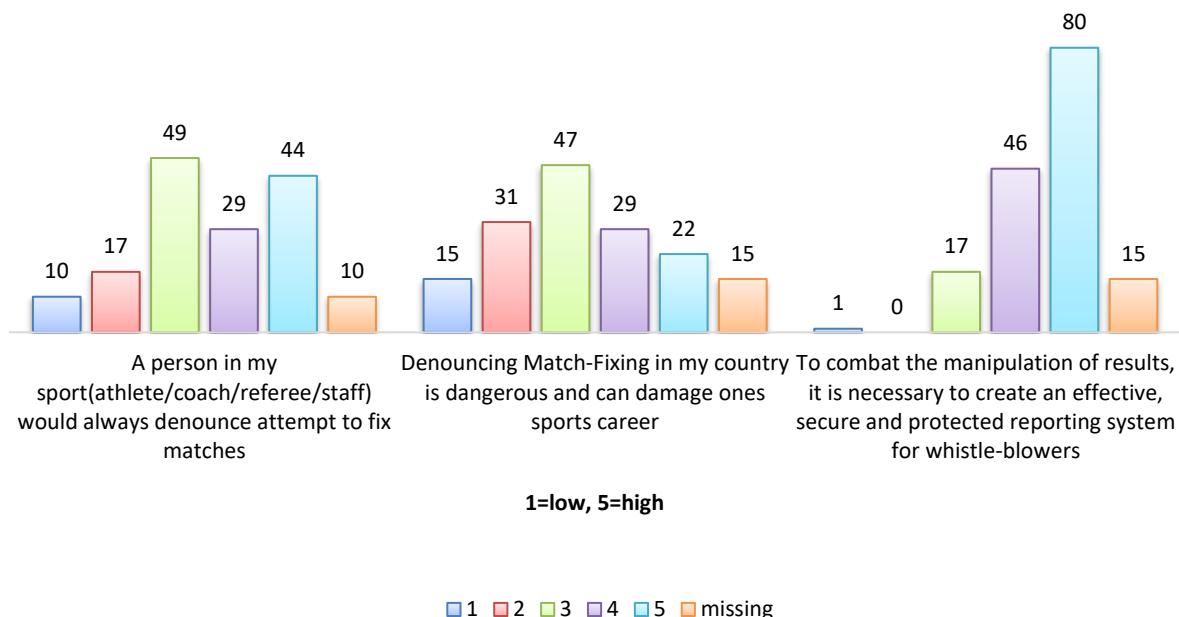
of corruption happening around them, corruption that is going unnoticed and/or unpunished. This would seem to indicate that there are perhaps organisational culture issues and/or policies within their clubs which either means the clubs are participating in corrupt practices or that other athletes are engaging because of internal factors within the club. The second highest response rate was 'reasonable' (32%) - is this because athletes that are engaging in match-fixing themselves do not want harsher penalties and believe in most cases the current system cannot catch them, so do not change the system? Finally, again 18% of respondents put down 'don't know' or 'don't care'. This denotes a general lack of awareness of anti-corruption policies in their sport; it also denotes a general lack of education in the area. As such, again this reinforces the conclusion that greater training and education are necessary both from the club and externally during the athletes' early career and even during childhood.

With regards to figure 53 the same type of split in the responses are seen. Of those who answered the question 64% believed that those caught match-fixing should face significant sanctions. This may be because players are again aware of significant corruption around them, corruption that is being left undiscovered and unpunished. This therefore again denotes a more widespread issue with corruption in Slovenian football. The second trend is that of unanswered questions, of all the participants in the survey 43% did not answer the question. This could be an indication again of widespread corruption in the sport; that some individual athletes are engaging and did not want to answer the question out of fear of being discovered.

What the results of figures 52 and 53 seem to indicate is that there are two possible concerning trends in Slovenian football, 1) match-fixing is quite widespread and 2) those athletes who do not engage are frustrated and concerned about the lack of action. In the case of the latter this also provides support for the notion that these are club issues rather than that of individuals, perhaps club policies are contributing to the problem and, moreover, that the disparity between some athletes' ethical standards and the club's ethical standards are creating the before mentioned workplace dissatisfaction amongst athletes. This notion of the importance of an ethical fit between employee and employer, and its influence on workplace satisfaction has been supported by previous research (Sims & Kroeck, 1994).

There is further evidence to support the conclusion that at least some athletes are concerned with the amount of unreported and unpunished corruption they see around them, perhaps also the club's involvement in these practices. Figure 54 outlines respondents' agreement with certain statements.

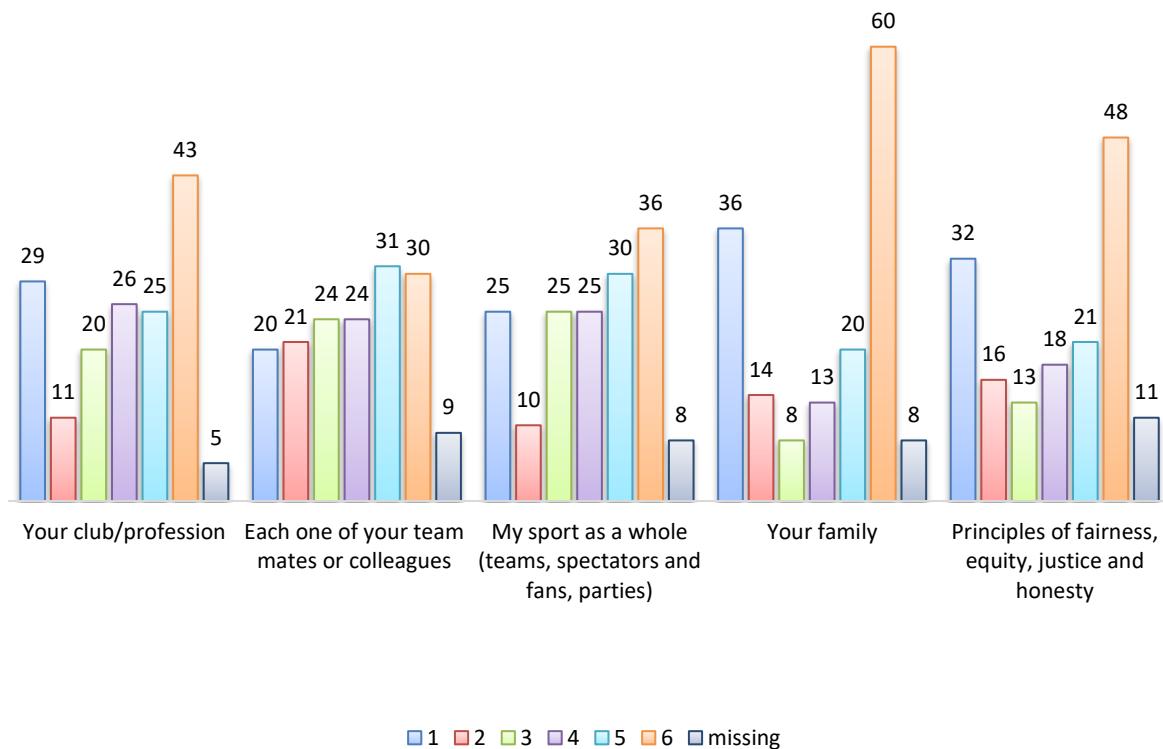
Figure 54 - Given your current situation, to what extent do you agree with the following statements?



With regards to the final statement here, 'To combat the manipulation of results, it is necessary to create an effective, secure and protected reporting system of whistle-blowers', this is further indication that there are problems within the club teams, sporting system as a whole in Slovenian football, and more than this that match-fixing may be more widespread than indicated. The fact that more than half (56%) of those that answered the question strongly agreed with this statement would seem to indicate that they are aware of widespread corruption, but fear speaking out. This may be because their fear the repercussions as outlined by responses to the second statement here, or because they fear losing their job, and given the importance of job security in Slovenian culture and the perception of limited opportunities, this is something the athletes do not want to risk. As such, this is indication again that greater ethical training is needed for stakeholders in football clubs in Slovenia (manager, trainers etc.). More than this, it would also be beneficial to ensure that human resource practices and policies during selection and recruitment emphasise the importance of ethics and good morals when deciding on new coaches, trainers and management hires. This would help to reduce the chances of unethical decisions, reduce the pressure on athletes and because of the improved ethical fit, generally improve the levels of satisfaction among athletes in the club. This is also important because considerable research has demonstrated that satisfied employees are more productive (Kazanas, 1978; Halkos & Bousinakis, 2010; Fassoulis & Alexopoulos, 2015) thus this indicates that positive ethics within a club can actually lead to improved results in Slovenian football. Finally, these results also reinforce the importance of dual career options, ensuring athletes obtain university education and opening up of greater job opportunities will go a long way in combatting corruption in Slovenian football.

To place these findings in context of loyalty, figure 55 outlines where respondent's loyalty lies in a select sample of options.

Figure 55 - In your opinion today, in order of importance, how much does loyalty count to the following?



When taking into consideration the responses to the final option 'principles of fairness, equity, justice and honesty', again the before mentioned split in results can be observed. Many people naturally feel that fairness, justice ethics etc. are important and whilst this may be a bit skewed because some respondents at least will just put down what they expect is the 'correct' answer, it is still clear that to some this is important. This may again indicate that Slovenian football has issues with ethical fit between club teams and players. On the other side a worrying percentage, almost 1/3 (32%), indicated that it was of little importance. This demonstrates again the split between the ethical and unethical elements of Slovenian football. The ethical would well see widespread corruption around them as a major concern and feel there is little they can do about it, whilst the unethical elements do not care and possibly engage in it. Family again seems to be the strongest response rate with regards to the importance of loyalty, thus again indicating the importance of the role of family in decision making in Slovenia and the importance of incorporating family members in anti-corruption training and education. Surprisingly, however, 1/3 (33%) of respondents did not find family loyalty as particularly important. Does this therefore mean club loyalty is more important, or perhaps loyalty to money? Further research is needed to determine this.

d) Protected Reporting System and protection of whistleblowers

Different laws are regulating match fixing and illegal gambling in Slovenia. 212.^º article of Criminal Code prohibits organizing pyramid money schemes and cooperation in betting activities, which are not explicitly defined as legal through publication of permits and concessions⁴⁰. Important part of legislature is defined in Law on gambling, where sports betting is defined as ‘classical’ gambling activity.⁴¹

Control over gambling activities in Slovenia is conducted by Department for control over gambling activities, as a part of Ministry of Finance. Its task is to check and analyze data for issuing concession agreements or licenses, controls and analyses implementation of the Law on gambling, issues recommendations for relevant proceedings at relevant authorities etc.

Law on sports defines general principles in sport in 3.^º Article and states: “3.3. Safeguarding and strengthening of moral and ethical values and avoiding dishonest achievements of results (doping, match-fixing)”.⁴²

Furthermore, the Slovenian Football Association has adopted the Disciplinary Rulebook regarding disciplinary offenses committed by players and officials. Article 19.1.^º and 24.1.^º states that Players or Officials shall be penalized for the following disciplinary offenses: »any conduct that may affect the integrity of a match or a competition under the auspices of the Slovenian Football Association, the Intermunicipal Football Association, UEFA, FIFA, such as, for example, conduct related to match fixing, bribery or co-operation in bribery, participation in sports betting, etc. The penalties imposed for disciplinary offenses related to match fixing are not specifically mentioned for such offences, but only the possible penalties imposed for disciplinary offenses in general are listed in the Disciplinary Rulebook implemented by the Slovenian Football Association.⁴³

What about existence of educational and prevention campaigns? Sport governing bodies, such as the Football Association of Slovenia and the Olympic Committee of Slovenia, strive to counter the scarcity of information and awareness to undertake prevention campaigns, education initiatives and training sessions in order to provide practical tools to recognize, resist and report match-fixing and other integrity threats.

⁴⁰ Kazenski zakonik (KZ-1). Uradni list RS, št. 55/2008. Accessible at: <https://www.uradni-list.si/glasilo-uradni-list-rs/vsebina?urlurid=20082296>

⁴¹ Zakon o igrah na srečo (ZIS). Uradni list RS, št. 14/11. Accessible at:
<http://pisrs.si/Pis.web/pregledPredpisa?id=ZAKO409>

⁴² Zakon o športu (ZŠpo-1). Uradni list RS, št. 29/17 in 21/18. Accessible at:
<http://www.pisrs.si/Pis.web/pregledPredpisa?id=ZAKO6853>

⁴³ Accessible at: http://www.nzs.si/Doc/Arhiv/Predpisi%20NZS/5%20-%20Disciplinski%20pravilnik%20NZS_V3.5_20062017.pdf

However, these programs are still in their infancy, deprived of an overarching engagement of sports betting operators, gambling regulator, law enforcement and public authorities and civil society organizations, underpinned by an efficient collaboration and information sharing network to enable a strategic and coordinated response to match-fixing, decisive to counter a context of impunity where loopholes to criminal opportunities are nurtured in the absence of a national and international co-operation against manipulation of sports competitions between concerned stakeholders.

In 2016, Olympic Committee of Slovenia introduced a whistleblowing reporting system called "Žvižgavka", that allows reporting of illegal and unethical practices in sports available to all athletes, including football players. Preliminary results of data collection in clubs in First Slovenian Football League imply that football players in general are not aware of existence of such mechanism. This may show additional need for further development of model for raising awareness about Žvižgavka, its function and effectiveness.

Another whistle-blowing reporting system that works in the same way as "Žvižgavka" is developed by Football Association of Slovenia, and as the named already suggests, it is particularly intended to offer a channel to expose corruption and match-fixing issues in football.

We have already discussed reporting system in our quantitative research. In comparison to it, qualitative research reveals complementary and additional horizon specifically on whistle-blowing reporting system. Generally, the entire data collected with interviews shows that the awareness on existence of match-fixing varies significantly among stakeholders, ranging from those completely denying existence of match-fixing in Slovenia to those, who are aware of its existence and dangers it poses to football. From our quantitative investigation athletes i.e., football players are clear with the fact that match-fixing is a big danger in sporting world.

Secondly, there is a lack of basic understanding of the role of whistle-blowers and the need for their protection in combatting match-fixing. Yet, among the interviewees, there is lack of understanding of what comprehensive systems of protection of whistleblowers mean. There is an evident existence of a belief among respondents that protection of whistleblowers starts and ends at the availability of a protected reporting mechanism, while it has established that comprehensive system of protection, which exceeds the sole whistleblowing line, is needed to protect whistleblowers and act on their complaints, otherwise potential future whistleblowers will be reluctant to come forward (Whitaker et al. 2014). Additionally, from the questionnaires, we have seen that athletes, to combat match-fixing, rely on effective in protected reporting system to combat match-fixing, while most surprising finding suggests that football players are not even aware of existence of any kind of whistleblowing line at their disposal.

A comprehensive protection of whistleblowers in sports should involve multiple stakeholders, while ensuring a whistleblower an accessible and secure communication channels, having a dedicated, autonomous authorities, charged with receiving and resolving the complaints or tips taking into

consideration different governance models of sports governing bodies and making sure that authorities are independent of political components of organisation (Schenk 2016) and equipped with knowledge, mandate and resources needed to perform their functions. Additionally, education and training on comprehensive protection of whistleblowers should not be limited to high-level officials but to all officials with decision-making powers throughout organisations, while also including football players, coaching staff, parents etc, and thus raising awareness and reducing stigma of whistleblowing. Furthermore, building on previously identified ‘code of silence’ within football, some have proposed to take measured response and softer penalties against teams, clubs or other institutions that speak up or come forward in good faith, thus further encouraging whistleblowing (Whitaker et al. 2014).

Finally, discussion among relevant stakeholders reveals a huge division between normative framework related to prevention of match-fixing, awareness of relevant stakeholders, training being conducted relating to aforementioned issues and number of different stakeholders involved in prevention of match-fixing, where civil society is more or less unrepresented. Stakeholders outside of the football often see football as sport with the highest risk of match-fixing and that more should be done to tackle the problem. Majority of interviewees believe that the key factor towards match-fixing issues is in raising awareness about it.

4.4.4 Conclusions

There are a number of surprising revelations brought forth by this research, perhaps the most startling of which seems to be the apparent issues with ethics in Slovenian football. In general there seems to be two potential major issues in Slovenian football, 1) there are a group of athletes which do not see ethics and morals as necessary in their lives, and as such this creates potential issues with risk of match-fixing and general corruption, and 2) there seems to be a number of issues originating from the club side in relation to ethical and corruption problems. One solution to these issues would clearly be ethical training and moral education. This is needed during childhood and early training for athletes. Such training will help to ensure that when athletes eventually become professional, they will act in a more ethical manner thus reducing the chances of corruption in Slovenian football. These education programs need to show the benefits of good decision making and ethical actions. There are numerous examples of the benefits of good ethics; there are also a number of programs in existence aimed at training children and young athletes in ethics etc. that could be implemented to help in this regard. Such education programs should be a requirement of training in any sports, particularly in football, which seems to have a major shortage of ethics. From the results it seems as a group of respondents care little about ethics or morals and this is therefore impacting their decision making. Furthermore, it is necessary to educate all stakeholders in sports with ethics and morals, not just those directly related to the sporting club e.g. manager, coaches, doctors etc., but also those in the close circle of

athletes. In particular this needs to include parents. Parents are a major source of help, decision making and advice to athletes in Slovenian football and so a parent that does not care about morals or that has no ethics, will pass these ideals (or lack thereof) on to their children. As such, parents also need to be shown the benefits of good ethical decisions, use case study examples, show examples when bad decision making has resulted in terrible results, demonstrate the effects of becoming involved in organised crime for the child of these parents. It is necessary to ensure that the selection and hiring practices of Slovenian football clubs emphasise the importance of good ethics and decision-making potential in their recruits; managerial and training staff. Given this, human resource policies and practices should be updated to include ethics clauses and interviews should specifically provide scenario questions related to the practice and examples of ethical decision making in potential employees and recruits.

More than this, this research demonstrates that there are a number of issues of internalisation of problems, a so-called code of silence, within Slovenian football. The result of which seems to be any issues are handled in private within the clubs. This can create major risks in relation to corruption and actually seems to be having an effect on player satisfaction, which in turn will have a major effect on performance and productivity of athletes, and the attainment of results. As such, it is necessary that such policies of internalisation within the clubs are re-examined and more transparency is created. Moreover, there appears to be a group of athletes with major concerns about unreported and unpunished corruption occurring around them. On the other hand, worrying fact is that many relevant individuals in sport do not know that reporting system in Slovenia even exists.

Furthermore, this report underpins the notion that a comprehensive protection of whistleblowers in sports should involve multiple stakeholders, while ensuring an accessible and secure communication channels for whistleblowers, having a dedicated, autonomous authorities dealing with protection of whistleblowers, providing education and training on comprehensive protection of whistleblowers, and explore the idea of introducing measured response and softer penalties for teams speaking up in good faith and thus encouraging further reports. Additional, continual evaluation of existing whistleblowing mechanisms and further analysis of emerging risks for match-fixing, corruption or other unethical and/or illegal actions need to be conducted to ensure that systems in place have an actual added value to prevention of whistleblowing and further identify possibilities for their improvements.

Additionally, to help ensure the protection of athletes and to help promote cultural elements relating to the denouncing of corruption and match-fixing, more careers avenues need to be created for athletes. The dual career project, ensuring athletes proceed through higher education (in any form) is one good option to help ensure the reduction of corruption. The new opportunities opened up by greater career options will ensure that athletes that have ethical dilemmas about actions of their team mates or clubs will be comfortable in speaking up and encouraging change in the culture around them. This is important because

it seems that, from this research, there are a number of athletes that have a strong ethical compass, but their own fears about job security, their perceptions about the lack of job opportunities in Slovenia, and internal ethical problems within the clubs they play for are creating serious satisfaction problems with their clubs and potentially causing some athletes to turn to corruption to protect their positions. This apparent lack of ethics-fit between the club and players needs to be addressed. This can be done through the before mentioned ethical training programs and or human resource practices.

Furthermore, from the club perspective the issues that seem to exist in relation to player contracts and club policies can best be addressed through the formation of national standards for contracts, policies and good practice principles. More than this, they need to be enforced; otherwise they are just words on paper. This will help to ensure that the organisational culture present in Slovenian football clubs will be a positive one, which supports the good decision making of athletes and employees. This, consequently, will ensure greater satisfaction in the workplace, which will again ensure improved results and may, therefore, improve the international performance of Slovenian club football, which will in turn have significant reputational and financial benefits.

4.4.5 Summary of Findings

- Lack of knowledge about corruption in sport and consequences/rules;
- Lack of education could be a problem in Slovenian football;
- Education needs to include family members;
- Clubs maybe engaging in unethical behaviour;
- Club recruitment and selection practices need to emphasise ethics and morals for new employees;
- A group of individuals engaging in unethical behaviour;
- Widespread match-fixing issues;
- Internalisation and code of silence in Slovenian football;
- The need for raising awareness and building capacity on issue of comprehensive protection of whistleblowers (i.e. Protected reporting systems).

4.4.6 Summary of Recommendations

- Create new ethical and moral training programs during youth and early career;
- Ensure that athletes are educated in positive decision making;
- Improve the strengthening integrity within sporting clubs and schools through education and specialised training;

- Support dual career programs and ensure education of athletes;
- Ensure club policies and human resource practices focus on the promotion of ethics (hiring and performance systems);
- Create a series of national standards and rules relating to player contracts and club policies (these can also be in the form of guidelines), and ensure they are enforced;
- Create set of measures aiming for greater transparency and good governance within sporting clubs and sports bodies;
- Create education programs targeting parents and families of athletes;
- Continually (re)evaluate existing whistleblowing mechanisms and analyse existing risks for match-fixing, corruption or other unethical and/or illegal actions;
- Raise awareness and build capacity of stakeholders on issue of comprehensive protection of whistleblowers.

4.5 Belgian report

4.5.1 Introduction

Doping affects one individual athlete, but the impact of match-fixing affects the whole competition. It is much bigger. The former IOC president Jacques Rogge mentioned that match-fixing was looking to appear as a monster for the sport world (Carpenter, 2012). According to EU governing bodies too, the manipulation of sports competitions hits at the heart of the integrity of sport. Widely known as match-fixing, it certainly undermines the values of sport such as fair play and respect for others (EU Expert Group on match-fixing, 2017).

According to several observers (e.g., Hill, 2010; Forrest, 2014; Costa, 2018), match-fixing has become more frequent in recent years thanks to the evolution of the internet and fast flow of information. In the literature, match-fixing is often divided into two different categories, betting or gambling related match-fixing and non-betting related match-fixing. Betting related match-fixing is often done with a view to earn more profits on the bets placed. It has been further divided into two parts (a) betting related match-fixing with bribery/coercion and (b) betting related match-fixing without bribery/coercion. Non-betting related match-fixing is carried out with a view of getting a sport benefit. Sport benefits could be deliberately losing in order to face an easy opponent in the next round of a tournament, gaining three points in a football match in order to achieve promotion to the higher league competition or not to be demoted to a lower league competition. It has also been further divided into two parts (a) non-betting related match-fixing with bribery/coercion and (b) non-betting related match-fixing without bribery/coercion (Harvey & Levi, 2016).

As a result of the growing concern about match-fixing, the efforts to control and prevent match-fixing have increased too. Against such a background, encouraging whistle-blowers and creating protected reporting systems for them are increasingly seen as effective measures to control match-fixing (Erickson, Backhouse & Carless, 2017). Meanwhile, sports are catching up with other industries to move towards a stronger governance, with whistleblowing not being an exception.

Reporting or not could be a dilemma of morality of principle versus morality of loyalty. Morality of principle refers to giving a due preference to morally good ethical or legal abstract principles, applicable in a particular organisational context, over one's relationship or an implied agreement to be committed to an organisation, people or a group of people within an organisation. On the other hand, morality of loyalty refers to giving priority and to be committed to the principles practiced within an organisation, people or a group of people within an organisation, irrespective of universally accepted ethical or legal principles (Uys & Senekal, 2008). In addition, a system to report could be a vital factor in reporting as unawareness of a reporting system could prevent an individual from reporting (Whitaker, Backhouse & Long, 2014).

In the Belgian part of the project we have conducted two different types of data collection and analysis:

Through in-depth interviews we have tried to understand the perceptions and attitudes of the stakeholders concerning match-fixing, the related control initiatives and the reporting of match-fixing in professional and grassroots sports in Belgium.

Through a survey among Flemish amateur and professional referees, we have aimed to get a broader picture of the same attitudes among a large group of respondents.

In the following two parts of the report, we discuss first the data collection and analysis of each research endeavour and then present the main results.

4.5.2 In-Depth Interviews with Stakeholders

Research design

For this part of the study seven participants were interviewed. All seven participants were working at various key stakeholder organisations, amongst others, on the issue of match-fixing. All the interviewees were carefully selected taking into consideration their experience and expertise related to the topic.

The interviews were semi-structured and followed a topic list, consisting of the following five main topics: perceptions on match-fixing, organisational initiatives, experiences with protected reporting systems, readiness to use protected reporting systems and general policy recommendations. The topic list was communicated in advance to the interviewees so that they could prepare their answers. At the same time, due to the semi-structured nature of the interviews, further questions were added as the conversation developed.

Results

a) Perceptions on match-fixing

Six participants of the seven admitted that match-fixing is a problem in general and a problem in their specific sport (tennis and football). One participant said it might be a problem but not at the top-level competitions.

The participants also stated that match-fixing has a long history in football and tennis and two of them added that they had witnessed match-fixing in tennis in Belgium. One of those two participants also mentioned that the participant had observed a proposal being made on social media to a player to fix a match. The remaining participants said they had never witnessed match-fixing personally.

Most of the participants were convinced that, while it has been widely accepted that tennis and football have match-fixing problems, other sport federations are yet to realise the existence of match-fixing in their sport.

All seven participants agreed that with the use of internet, match-fixing has risen. One participant specifically mentioned that with the evolution of the internet it has become easier to bet. In addition, potential betters and other stakeholders, including athletes, managers, spectators, have very fast and easy access to an increasing amount of information, which feeds bets. For example, in tennis the problem of courtsiders. Presence of courtsiders helps bettors to obtain information faster.

Two participants highlighted and articulated the problem of 'courtsiders'. Courtsiders around tennis courts have become a very big problem. A courtsider is someone who is around the tennis court and who is taped with mobile phones or other devices in order to pass live information regarding events happening on the court. Such information could be little signs of an injury or a display of fatigue from a player and other actions which could lead to predict the results of a point, a set or a match. This information is passed on to the people who pay the courtsiders for information. The information is usually used for betting purposes and to earn more money from betting. The information provided by the courtsiders reaches bettors before it is broadcasted live. In the current legal system in Belgium, the Belgian Penal Code does not provide any provision, criminalising any attempts and/or actions of the courtsiders. Resultantly, there are limited means available to the concerned federation and the law enforcement authorities to prevent and stop the problem of courtsiders. Both participants highlighted that this has to be discussed amongst the national and international tennis federations as well as the betting operators in Belgium.

Five participants reported the findings of a recent research project conducted by the University of Ghent according to which betting or gambling related match-fixing occurs much less frequently than non-betting related match-fixing in football, tennis and table-tennis. Betting related match-fixing comprises 10% and non-betting related match-fixing 90% of the total match-fixing. On the contrary, one participant mentioned that most of the match-fixing is on the betting side. The participant explained that the primary reason to fix a match is financial and therefore it is an easy assumption that match-fixing is often related to betting or gambling.

Five out of seven participants admitted that they had no concrete idea about the incidents of match-fixing in either professional or grassroots sports in Belgium. On the other hand, according to the data communicated to us by the RBFA, only one match was fixed in Belgian professional football in the last ten years. In grassroots football, 15-25 out of 300,000 matches are fixed per year.

According to two participants, match-fixing has only become a problem in Belgium in the last two years. For the other five participants, however, match-fixing has been a problem for a longer time and is mainly spread at lower-level competitions in both football and tennis.

All participants stated that match-fixing at the professional level is betting or gambling related (in most of the cases) and match-fixing at grassroots level is non-betting or non-gambling related.

All participants admitted that match-fixing has increased in past twenty years because of the evolution of the internet.

When asked about whether match-fixing is more or less widespread in other European countries than in Belgium, five out of seven participants said that there are a few countries (mostly eastern European) where match-fixing happens more than in Belgium and highlighted that western European countries are secured. However, one participant stated that match-fixing is more or less the same in all European countries.

b) Probability of discovering match-fixing

As far as football is concerned, one participant stressed that if only one or two actors decide to fix a match and to bet on it, nobody will discover the fix, if the two perpetrators do not speak about the fix to anyone. Hence, two perpetrators have a high chance of remaining undiscovered and resultantly of being unpunished.

According to another participant, chances of an actor being discovered and punished could not be predicted. In order to discover and punish actors, one participant highlighted the Article 13 of the Macolin Convention which gives the power to establish the National Platform. The participant stated that the National Platform would help to share the information between the different stakeholders and would end up in actors getting discovered and punished.

While stating a differing opinion, two participants pointed out that some factors influence the chances of discovering and punishing a fix. Such factors are, among others, the sport itself, the popularity of the sport and the media attention given to the sport.

All participants were of the opinion that the motivation to fix a game is solely financial. When asked about sexual favours used to pursue different actors to fix a match, all participants mentioned they are unaware of the usage of any sexual favours for match-fixing.

Organisational initiatives concerning match-fixing

a) Law enforcement

Law enforcement is one of the primary stakeholders in Belgium who were active since 2010. Along with the Ministry of Justice, the Ministry of Interior Affairs and the prosecutors' offices they created a hotline concentrated on reporting match-fixing in football. The same hotline was extended to other sports in 2013. At the beginning of 2016, major efforts were made to establish a National Platform under Article 13 of the Macolin Convention; such a Platform was established at the end of 2016. In April, 2016, law enforcement along with Interpol and the IOC organised a sport partnership development meeting, which was funded by the IOC.

The National Platform consists of three different levels:

Management – All partners

Steering group – Police, Ministry of Justice and the three ministers of sports

Taskforce signals – Prosecutors' office and police accept and analyse the information from all the members, take decisions regarding the opening of a file or not, and initiate the coordination efforts with the sports organisations.

Apart from its role in preventing and controlling match-fixing, law enforcement has played a major role in organising several key meetings of stakeholders in cooperation with Interpol. In order to create human resource and update knowledge regarding match-fixing related issues, trainings for police personnel are planned.

Football:

The RBFA is the governing body for football in Belgium. It is the most important responsibility of the RBFA to fight match-fixing in Belgium. The organisation claims that huge preventive efforts have been taken; for every tournament from U15 to the first teams (men and women), education in the form of presentations is given to players and technical staff about match-fixing. This pattern has been followed since the UEFA started the designation of integrity officers, i.e. since 2011. However, current efforts could be improved in order to reach more clubs and individuals. The organisation has planned to give presentations about match-fixing to every club playing in the top two divisions in near future. The RBFA mainly works with UEFA and FIFA for preventing match-fixing. Funds are also dispensed by UEFA to the RBFA for prevention programmes.

Tennis:

Tennis Vlaanderen is the governing body for Tennis in Flanders in Belgium. It is important to note that most of the initiatives in terms of policies against match-fixing were incorporated after the establishment of the National Platform.

Tennis Vlaanderen has taken following initiatives:

There is a single point of contact for integrity issues.

The organisation has developed an anti-corruption code.

Insertion of 'integrity declaration' for players who are under contract with the federation and every player that is supported by the Tennis Vlaanderen.

Prevention campaign for international and national top players through emails.

Info (training) sessions once every two years for new young international players (and their parents).

Prevention campaigns for international coaches through emails making them aware of their duties at the international circuits.

Prevention campaign for international officials concerning decision making in match-fixing cases.

Prevention campaign for international tournament directors and referees through emails.

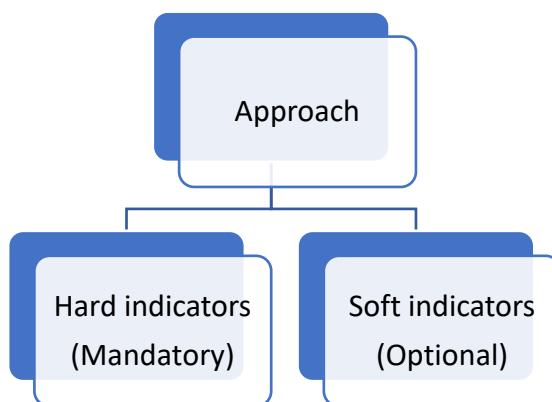
Integrated action plan for international tournaments developed together with the local prosecutor, law enforcement, tournament directors and referees in order to exchange data and contact numbers.

The code developed by the TIU is always followed and kept under consideration.

The organisation admitted that there were no efforts taken by Tennis Vlaanderen before 2016 specifically to prevent match-fixing.

Sports Flanders (Government):

As the government, Sports Flanders is responsible for subsidising sports organisations based on their performance. The organisation has developed a ‘hard-soft’ approach for subsidising sports federations.



Whereas the fulfilment of the hard indicators is mandatory to the sports organisations in order to receive the subsidy, soft indicators are more of a voluntary action that the organisation rewards financially to those sports organisations who meet them. Match-fixing currently falls under soft indicators. This approach has been introduced in 2016 and will last for 4 years. The current policy will be revisited and reviewed after Tokyo 2020 Olympics.

The organisation has played a leading role in creating the International Centre for Ethics in Sports (ICES) and through ICES several policies are being worked upon.

The organisation, however, has not organised any trainings for preventing match-fixing in particular and is planning a few trainings in the future.

b) Cooperation

The cooperation between all the stakeholders involved happens through the National Platform established. The National platform meets two to three times a year in order to discuss developments and issues. The activities of the National Platform mainly include developing a dialogue between the law enforcement and sports organisations. In addition, the National Platform activities include the sharing of practices (methods) followed in a particular sport in order to develop a unified system to prevent and control match-fixing across the different sports.

c) The National Platform

One of the important purposes of the National Platform is to share information related to match-fixing.

One participant opined that the responsibility should be taken by the sports organisations to voluntarily share the information related to match-fixing. At the same time the sports organisations should make sure that the information is not hidden from the public authorities. The participant further explained that the information flow from the sports organisations to the law enforcement should be faster and the sports organisations should not waste any time sharing the information. It has been noticed that sports organisations sometimes withhold information to conduct internal investigations before sharing it with law enforcement. If the information is withheld by a sports organisation, such information could be misused to cover up wrongdoings or could be hidden and never be shared.

On the other hand, one participant mentioned that dealing with law enforcement is one of the hardest parts because of the delay in sharing the information due to professional secrecy. There is a one way flow of the information from the sports organisations to the law enforcement, whereas there should be a balance.

Four other participants stated that the national platform (due to the inclusion of law enforcement) is more helpful than the international federations because the law enforcement in the country has the power to take appropriate actions (search, seize and confiscate material/devices as well as arrest individuals). The action from the international federations, however, takes more time. In addition, the international federations have less power in other countries.

d) Means of communication

The organisations prefer to communicate with other stakeholders via email, calling and texting through mobile phones.

e) Assessment of efforts of other sports federations and law enforcement agencies

Four participants stated that their counterparts are not doing enough and more needs to be done. More efforts from basketball and badminton federations are welcomed in the fight against match-fixing.

Three participants were of the opinion that their counterparts are doing a good job, but that more could be done.

f) Experiences with protected reporting systems and general suggestions

All participants from the sports organisations and law enforcement stated that they already have a protected reporting system in their organisation.

All the participants mentioned not being aware of a system in Belgium or Europe that could be considered a best practice for the safe and effective reporting of match-fixing.

The participants stated that the value added of a protected reporting system could be:

- Security (highlighted by two interviewees);
- Confidentiality;
- Reach of the system;
- Awareness;
- Protection of information;
- Direct flow of information from the informant to the appropriate authority.

Risks/disadvantages of the reporting system could be:

- Traceability of the informant;
- Misuse;
- False information;
- Information given to blackmail somebody;
- Anonymity;
- Lack of follow-up;
- An actor reporting might lose trust or confidence in the sports federation;
- Information could be covered up.

g) Who should manage the reporting system?

The opinions of the participants were divided:

One participant firmly mentioned that the reporting system for match-fixing should be managed by law enforcement as only law enforcement has the power to take action; however, the information should be managed by the prosecutors' office.

Another participant suggested that the protected reporting system should be managed by the managing board of the National Platform, where the flow of information would be centralised. This would also help to coordinate investigations.

Another participant suggested that open reporting/visible reporting booths at tournament sites could help along with the traditional ways of reporting. The participant stressed that the protected reporting system should be managed by the law enforcement.

Another participant proposed that there should be (at least two) options available to the person reporting and therefore the protected reporting system should be available simultaneously at the sports organisations as well as at the law enforcement. The participant pointed out that if an individual willing to report is not comfortable with one option or if he/she does not trust someone within the organisation where he intends to report, he will not report. The person willing to report should always have another option. The participant emphasised that the reporting system should be managed by a national organisation.

All the participants welcomed the view of the reporting system acting as a helpline; however, one participant mentioned that different platforms should be made available to report and reporting should not be limited to reporting systems.

h) Readiness to use a protected reporting system

One participant witnessed match-fixing in tennis and reported it to law enforcement. The participant used the telephone as medium to report. Another participant mentioned that he directly reported a suspected match-fixing to the prosecutors' office. Five other participants said not to have witnessed or suspected match-fixing personally.

Table 16 - Factors that would motivate and prevent from reporting match-fixing using a reporting system

What are the factors that would motivate and prevent from reporting match-fixing using a reporting system?	
Motivational Factors	Preventive factors
<ol style="list-style-type: none"> 1. Personal integrity 2. Purity of the sport 3. Assurance that the information will be delivered to and heard by the appropriate authority 4. Action will be taken 5. Exposure of having a protected reporting system 6. Official character 7. Protected character 	<ol style="list-style-type: none"> 1. Family problems 2. Personal problems 3. Fear of being thrown out of the team 4. Fear of fans turning against them 5. Fear of not getting a new contract 6. Fear of retaliation 7. Threat of organised crime 8. Threat to family 9. Pressure of team mates 10. Psychological pressure 11. Threat of information being leaked 12. Bad examples set by the alike events of corruption at the governing bodies

Participants differed in their opinions about which individuals and groups of people are more likely to report using a reporting system. One participant stated that young people would report if they are aware of the consequences, especially if they have been given education on match-fixing. The participant continued that athletes/players who are near the end of their careers are less likely to report. Another participant suggested that players/athletes who are unaware of the consequences of fixing a game might not report. Another participant stated that professional athletes are role models and should set an example by reporting match-fixing cases. All the participants mentioned that gender does not play any role in taking a decision to report or not.

i) Stakeholders' recommendations

Establishing a European Integrity Agency could be an added value for the fight against integrity issues, including match-fixing.

At the EU level, all projects related to match-fixing should be put under same umbrella in order to increase effectiveness and efficiency.

Match-fixing is a cross-border phenomenon; there should be a strong stance taken by the EU against countries like Malta which is not taking actions against match-fixing. A reporting system at the EU level would be helpful.

Prevention should be the focus of sports organisations. Sports organisations should start giving presentations explaining the problem of match-fixing to young players/athletes. They should also explain the preferred actions in case someone is approached. The participants stated that education is an important part of prevention.

Approach of prevention, education, detection and repression should be preferred.

Players Unions have a role to play in educating players/athletes alongside the federations. Education shall reach the dressing rooms of players/athletes.

Live betting should be prohibited for lesser prize money competitions and youth competitions, especially in individual sports.

Betting operators have the responsibility to look after what are they offering to bet on.

The webpage where the contact details are given to report should also mention the consequences of not reporting.

The sanctions for people who have been caught match-fixing should be displayed so that the public becomes aware of the problem.

The sanctioning should be proportionate.

Corruption in sports should be included in the Belgian criminal law.

The term courtsiders should be defined by law. The phenomenon of the courtsiders should be looked at by the legislators.

The coordination between organisations within Belgium should improve.

4.5.3 Survey among Dutch-speaking football referees

Research design

In this chapter of Part II, we present the research design of a survey administered to football referees of the RBFA between November 2018 and January 2019. We start with a brief discussion of the contents of the surveys, and continue with the sampling procedure and some information about the final sample.

Questionnaire

We have operationalized the key concepts in a questionnaire, which we have administered via a web survey. In the first part, we questioned some background characteristics, such as gender, year of birth, highest educational level attained, and asked the respondents to indicate whether they were active as a referee on the professional level (meaning that the remuneration received for the activities as referee is sufficient to live from) or the grassroots level (meaning that the remuneration received for the activities as referee is insufficient to live from). The remaining questions focused on their attitudes towards match-fixing (first three parts) and their personal experiences with match-fixing (last part). Firstly, we questioned the referees' attitudes towards the incidence of match-fixing in football, by asking them to indicate, for both matches at the professional and grassroots level, the percentage of the matches that were currently fixed according to them, as well as whether the percentage of fixed matches had decreased, remained constant or increased in the past five years, according to them.

Secondly, we focused on the referees' attitudes towards the disclosure and combatting of match-fixing. Here, we first asked the respondents to assess the likelihood of a case of match-fixing being disclosed in football on the one hand and of the people involved in a case of match-fixing in football being punished, if the case had been disclosed, on the other hand (both on a 5-point scale ranging from *very unlikely* to *very likely*). In addition, we asked them to indicate their level of agreement with following statements, which were asked separately for each of the actors involved in football games (players, coaches, referees and officials): (1) "in football, a(n) player / coach/ referee / official will always expose an attempt to fix a result"; (2) "if a(n) player / coach / referee / official exposes match-fixing in Belgium, this will harm his/her (sports) career"; (3) "if a(n) player / coach / referee / official exposes match-fixing in Belgium, he or she is sufficiently protected against reprisals"; and (4) "in order to successfully reduce match-fixing in Belgium it is necessary to create a protected reporting system for players / coaches / referees / officials". Respondents could answer to the statements on a 5-point scale ranging from *strongly disagree* to *strongly agree*. Finally, we asked the respondents to indicate how acceptable they thought reporting match-fixing cases was among referees on a 5-point scale ranging from *very unacceptable* to *very acceptable*.

Thirdly, we focused on the referees' knowledge of and attitudes towards protected reporting systems for match-fixing. Here, we first asked them whether they were aware of existing protected reporting systems for match-fixing, and if so, of which ones. Moreover, we asked them to indicate which institution should be responsible for managing a protected reporting system for match-fixing.⁴⁴

In the final part of the questionnaire, we focused on the referees' personal experiences with match-fixing and the reporting of it. First, we asked them how often they had witnessed or suspected match-fixing

⁴⁴ Possible answers: National Olympic Committee; sports federations; sports secretariat/Ministry of Sport; police; judiciary; independent entity of civil society; players' unions or other body.

in football. The five possible answers – ranging from *never* to *more than five times* – served to direct respondents to the next set of questions. Respondents who reported that they had *never* witnessed or suspected match-fixing, were immediately asked to indicate the reasons that would encourage them to report a case of match-fixing in football⁴⁵, as well as to indicate the reasons that would prevent them from doing so⁴⁶. Respondents who indicated that they had witnessed or suspected match-fixing on a single (*once*) or multiple occasions (*twice, three to five times or more than five times*), were first asked to indicate whether they had reported to someone the only or, in case of multiple cases, the last case of match-fixing witnessed or suspected. Respondents who indicated not to have reported the only or last case of match-fixing witnessed or suspected were asked to indicate the reason(s) that had prevented them from doing so.⁴⁷ On the other hand, respondents who indicated that they had reported the only or last case of match-fixing witnessed or suspected were asked to indicate whether they had reported the corresponding case to each of the following institutions: sports federation, police, judiciary, press and other institution(s). In addition, they were also instructed to indicate the reasons that had motivated them to report the corresponding case of match-fixing.⁴⁸

Sampling procedure and final sample

The target population consisted of all Dutch-speaking football referees associated to the RFBA, the largest Belgian football association. More concretely, via the extranet the RBFA uses to communicate with its football referees, all of the members of the target population were sent an invitation with the link to access the survey on Limesurvey, an online survey software program. The survey ran from November 2018 to January 2019. In total, 595 questionnaires could be retained for the analyses.⁴⁹

⁴⁵ Possible reasons: love/respect for the sport; protection of the integrity of the sport; abiding the law; defense of ethics and fair-play; fear of being involved in an organized crime scheme; fear of the consequences for the (sports) career; fear of the consequences for the personal life; loss of sponsorships; loss of prestige; reception of a reward; other reasons

⁴⁶ Possible reasons: fear of the consequences for the (sports) career, fear of the consequences for the personal life; fear of losing sponsorships; fear of losing prestige; fear of exclusion from the sports system; lack of confidence in the sports system or the application of sports sanctions; lack of confidence in justice or the application of criminal sanctions; lack of confidence in the existing reporting systems; lack of security for people reporting cases of match-fixing; breaking the code of silence; disclosure of confidential information; other reasons

⁴⁷ Ibidem footnote 3

⁴⁸ Ibidem footnote 4

⁴⁹ For a record to be retained for the analyses, at least the first two questions of the block about the attitudes towards the incidence of match-fixing had to have been completed.

The large majority of the respondents were male (97.6%). The referees' age ranged from 15 years to 77 years, with an average age of 39.08 years ($SD = 16.58$ years). With regards to the highest educational level attained, 9.2% of the referees had no or a primary educational degree, 45.0% a secondary educational degree and 45.7% a higher educational degree. Finally, the large majority of the referees (96.3%) were active on the grassroots level, meaning that they could not live from the remuneration they received for their activities as referee.

Results

In this chapter we present the results of the analyses of the survey data. First, we discuss the referees' attitudes towards the incidence of match-fixing. Next, we focus on the attitudes the referees have towards the disclosure and combatting of match-fixing, followed by a description of their knowledge of and attitudes towards protected reporting systems for match-fixing. Finally, we give an overview of the referees' personal experiences with match-fixing and the reporting of it.

a) Incidence of match-fixing

Table 17 summarizes the referees' assessments of the incidence of fixing football games in Belgium, split up for professional and grassroots matches. Here, we see that the majority of the referees assessed the current percentage of Belgium football matches fixed to be less than 10% (56.5% for professional matches and 55.6% for grassroots matches). However, approximately one in six referees assessed a quarter or more of the current Belgium football matches to be fixed. As is clear from this table, the referees expected little to no differences in the percentage of football matches fixed between the professional and grassroots level.

Table 17. Referees' assessments of the current percentage of professional and grassroots football matches fixed in Belgium

Percentage of matches fixed	Level	
	Professional level	Grassroots level
<5%	33.4%	34.4%
5% - 9.99%	23.1%	21.2%
10% - 24.99%	24.6%	28.5%
25% - 49.99%	12.5%	11.7%
≥ 50%	6.4%	4.2%

With regards to the trend in the fixing of Belgium football matches, the large majority of the referees believed that the percentage of fixed matches had remained constant or increased in the past five years. However, some differences can be observed between the professional and grassroots level here: 65.7% of the referees thought that the percentage of fixed grassroots matches had remained constant, whereas only 45.7% thought that this was the case for professional matches. On the other hand, 38.2% of the referees believed that the percentage of professional matches fixed had increased, whereas only 20.2% believed this

was the case for grassroots matches. In any case, for both professional and grassroots matches, a large minority of the referees believed that the percentage of fixed matches had decreased in the past five years (professional matches: 16.1%; grassroots matches: 13.9%).

b) Disclosure and punishment of match-fixing

The likelihood of match-fixing in football being disclosed was assessed as (very) high by only one third of the referees (32.2%); 26.8% of the referees assessed this likelihood as medium and 41.0% as high. On the other hand, approximately six out of ten referees (59.7%) assessed the likelihood of people involved in match-fixing in football being punished, if a case is disclosed, as high; 18.0% assessed this likelihood as medium and 22.3% as low.

Table 18 summarizes the answers to the four statements about the disclosure and combatting of match-fixing. First, the referees clearly indicated that officials, and particularly players and coaches, will not expose attempts of match-fixing in football (only 15.3%, 7.4% and 7.1% of the referees (strongly) agreed with the statements for players, coaches and officials, respectively). However, referees would be more likely to expose attempts of match-fixing in football (37.2% of the respondents (strongly) agreed with the respective statement). Second, for each actor involved in a football game, the majority of the referees indicated that exposing match-fixing would be harmful for their (sports) career (between 56.3% and 71.4% (strongly) agreed with the statements). Thirdly, the referees disagreed rather than agreed with the statement that actors exposing match-fixing are sufficiently protected against reprisals (between 34.0% and 42.1% (strongly) disagreed with the statements, whereas only 18.4% to 21.6% (strongly) agreed with the statements). Fourth, the absolute majority of the referees indicated that protected reporting systems for the different actors are necessary to successfully reduce match-fixing (between 83.2% and 85.1% (strongly) agreed with the statements).

Table 18. Referees' level of agreement with the statements about the disclosure and combatting of match-fixing

Statement	Level of agreement				
	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
"In football, a(n) ... will always expose an attempt to fix a result"					
Player	31.3%	46.6%	14.7%	5.4%	2.0%
Coach	29.9%	45.4%	17.6%	4.9%	2.2%
Referee	16.6%	25.5%	20.8%	30.1%	7.1%
Official	23.1%	37.5%	24.2%	11.7%	3.6%

"If a(n) ... exposes match-fixing in Belgium, this will harm his/her (sports) career"	Player	1.9%	11.4%	15.4%	47.8%	23.6%
	Coach	2.4%	11.7%	17.1%	44.0%	24.8%
	Referee	10.7%	16.3%	10.8%	25.6%	36.6%
	Official	5.3%	18.8%	19.7%	35.3%	21.0%
"If a(n) ... exposes match-fixing in Belgium, he or she is sufficiently protected against reprisals"	Player	7.8%	29.7%	43.1%	17.0%	2.4%
	Coach	6.8%	30.5%	44.3%	16.2%	2.2%
	Referee	14.5%	27.6%	37.1%	16.0%	4.8%
	Official	6.8%	27.2%	44.4%	17.2%	4.4%
"In order to successfully reduce match-fixing in Belgium it is necessary to create a protected reporting system for ..."	Players	1.7%	3.6%	9.7%	46.9%	38.1%
	Coaches	1.7%	4.6%	10.0%	46.8%	36.9%
	Referees	2.2%	3.4%	9.3%	39.5%	45.6%
	Officials	2.4%	4.4%	10.0%	46.0%	37.2%

Finally, 28.5% of the respondents declared that reporting match-fixing is (very) unacceptable among referees, whereas 17.5% indicated that this is neither unacceptable, nor acceptable among referees and 54.1% stated that this is (very) acceptable among referees.

c) Protected reporting systems for match-fixing

Only 11.1% of the referees was aware of at least one protected reporting system for match-fixing, with more than 90% of these referees mentioning (among others) the reporting system of the RBFA, when asked to indicate the protected reporting systems they knew. As regards the institution the referees preferred as manager for a protected reporting system for match-fixing, the largest group choose the sports federations (28.2%), followed by the sports secretariat/Ministry of Sport (21.9%), an independent entity of civil society (18.8%) and the judiciary (18.1%). Way less referees preferred the police (7.1%), the National Olympic Committee (3.5%), players' unions (1.9%) or other institutions (0.5%) as managers for such system.

d) Personal experiences with match-fixing and reporting

Approximately three quarters of the referees (76.5%) had never witnessed or suspected match-fixing in football. Hence, almost a quarter (23.5% or 138 referees) had already witnessed or suspected match-fixing in football at least on one occasion. More concretely, 7.7% (or 45 referees) indicated that they had witnessed or suspected match-fixing once, 5.3% (or 31 referees) twice, 4.6% (or 27 referees) three to five times and 6.0% (or 35 referees) more than five times. Only 12.4% (or 17) of the respondents who had witnessed or suspected match-fixing, had reported the only (in case of witnessing or suspecting only one match-fixing case) or last (in case of witnessing or suspecting multiple cases of match-fixing) case of match-fixing. More concretely, 13 of the 17 referees had reported the only/last case of match-fixing to the sports federation; one of these 13 referees had also reported the corresponding case of match-fixing to the police. None of the 17 referees had reported the only/last case of match-fixing to the judiciary or the press, but four of them had reported to other ‘institutions’, such as colleagues. Hence, these results clearly indicate that football referees report almost exclusively to the federation they are associated to, i.e., the RBFA, and not at all to criminal justice actors.

Table 19 gives an overview of the aspects that would encourage or discourage referees who had not witnessed or suspected match-fixing to report such incidents, in case they would witness or suspect any in the future. Here, we see that referees would primarily report match-fixing because of their love/respect for the sport, to protect the integrity of the sport, and to defend ethics and fair-play. Ensuring that the law is abided would also be an important consideration for reporting match-fixing. On the other hand, we see that primarily the fear of the consequences of reporting and the lack of security for people reporting would discourage them from reporting match-fixing. Also, the lack of confidence in the existing reporting systems and the institutions following up on alerts, or their sanctions, would discourage quite some referees to report match-fixing.

Table 19. Reasons for (not) reporting match-fixing (hypothetical)

Reasons for reporting match-fixing		Reasons for not reporting match-fixing	
Love/respect for the sport	71.0%	Fear of the consequences for the personal life	41.5%
Protection of the integrity of the sport	70.1%	Lack of security for people reporting cases of match-fixing	29.2%
Defense of ethics and fair-play	62.1%	Fear of the consequences for the (sports) career	27.9%
Abiding the law	45.5%	Lack of confidence in the existing reporting systems	22.5%
Fear of the consequences for the (sports) career	21.4%	Lack of confidence in the sports system or the application of sports sanctions	21.7%
Fear of being involved in an organized crime scheme	18.5%	Lack of confidence in justice or the application of criminal sanctions	21.7%
Fear of the consequences for the personal life	17.2%	Fear of exclusion from the sports system	15.2%

Loss of prestige	9.2%	Disclosure of confidential information	7.1%
Reception of a reward	3.6%	Fear of losing prestige	6.5%
Loss of sponsorships	1.1%	Breaking the code of silence	5.8%
Other	-	Fear of losing sponsorships	2.7%
		Other	-

Table 20 summarizes the reasons for referees to report or not report the only/last case of match-fixing they had witnessed or suspected. With regards to the reasons for reporting match-fixing, a similar image as for the referees who had not witnessed or suspected match-fixing emerged, with the love/respect for the sport and protecting the integrity of the sport, as well as defending ethics and fair-play as the most important reasons to report match-fixing. However, as regards the reasons for not reporting match-fixing, some differences with the referees who had not witnessed or suspected match-fixing were found. More concretely, not fear of the consequences, but a lack of confidence in the reporting systems and the institutions following up on alerts, or their sanctions, and a lack of security for people reporting were the primary reasons not to report match-fixing. In addition, other reasons, in particular a lack of evidence, were important to withhold from reporting match-fixing.

Table 20. Reasons for (not) reporting match-fixing (actual)

Reasons for reporting match-fixing		Reasons for not reporting match-fixing	
Love/respect for the sport	12/18	Lack of confidence in the sports system or the application of sports sanctions	38.0%
Protection of the integrity of the sport	10/18	Other	36.4%
Defense of ethics and fair-play	9/18	Lack of confidence in the existing reporting systems	24.8%
Abiding the law	4/18	Lack of security for people reporting cases of match-fixing	19.8%
Fear of the consequences for the (sports) career	2/18	Lack of confidence in justice or the application of criminal sanctions	18.2%
Fear of the consequences for the personal life	2/18	Fear of the consequences for the (sports) career	14.9%
Fear of being involved in an organized crime scheme	1/18	Disclosure of confidential information	11.6%
Loss of sponsorships	-	Breaking the code of silence	10.7%
Loss of prestige	-	Fear of the consequences for the personal life	9.9%
Reception of a reward	-	Fear of exclusion from the sports system	9.1%
Other	-	Fear of losing prestige	1.7%
		Fear of losing sponsorships	-

5. Quantitative-qualitative insights on the use and perception of match-fixing and protected reporting systems

Based on the results of the research reports carried out in the various partner countries, emerged both, member states peculiarities and common areas of interest.

In the following chapter, attention will be focused on the common elements found between member states and therefore close to the European perception of match-fixing phenomenon and of the protected reports, as a privileged tool for preventing and fighting against it.

However, in-depth boxes have been inserted at the same time, summarizing the peculiarities of the project partner countries in order not to lose the enrichment that each individual case related to the member states in question brings with them.

5.1 Factors that lead to fix

From the cross-sectional analysis of the partners' research reports, it is possible to highlight some common factors that can lead players to fix the games in which they participate. Below is the detail.

- The primary reason to fix a match is financial and therefore it is an easy assumption that match-fixing is often related to betting or gambling;
- Most of the interviewees stated that match-fixing at the professional level is betting or gambling related and match-fixing at grassroots level is non-betting or non-gambling related;
- A stated conditioning factor is the fear of sporting reprisals in the case of not collaboration in fixing;
- Another conditioning factor is the lack of present and future career securities. Dual career programs have been acknowledged by many international bodies, sporting associations and think tanks, as being vital for assisting athletes to ensure a minimization of the risk factors associated with match-fixing and corruption;
- The lack of education was indicated as a key-factor that increases corruption;
- The lack of awareness has been recognized as another key-factor that increases the match-fixing phenomenon. Some athletes at least may not be aware of what they are signing or doing, and are completely under the control of a third party e.g. family member or another member of their club (e.g. manager/coach). This creates a dangerous set of factors which could lead to an increase, not only in rates of match-fixing, corruption but also doping etc. The athletes do not know what they are doing, but simply follow someone they trust;
- The stipulation of a contract that do not contain a match-fixing clause;

- The lack of regulations on match-fixing, on gambling, on protected reporting systems and on whistleblowing protection;
- The non-involvement of families in the actions of involvement and awareness-raising on these issues. Has been proved that there is a direct link between decision making, ethics, and corruption between an athlete and their family. This indicate that ethical training and anti-corruption courses would be more effective if they were also provided to family members of athletes;
- A low profile of the team culture and its moral standards. It has a core in influencing the behaviors and actions of an athlete. As such, a team which believes that ethics are irrelevant, a team that focuses on the win at all costs etc. will likely continue to create players with the same outlook and decision-making issues;
- The absence of a widely held practice that ethical/moral and anti-corruption training also focused towards all stakeholders. This should not only focus on managers, coaches, and trainers, but also incorporate doctors, masseuses, etc. These actors also have an important role in the psychological wellbeing of the athletes and are often turned to for advice, for they have a trust based relationship with the players.

5.2 The importance of the presence of ethics in sport

The vast majority of respondents of the interviews that have been done during the research part of this project declare that love and respect for sport, the need to protect the integrity of the sport, and the defense of ethics and Fair Play, are the three main reasons for reporting a manipulation of results.

But in their opinion, the actual level of presence of ethics and fairness in sport is really low.

The absolute majority of the respondents refused to answer the question "In your opinion, which is the actual level of presence of ethics and fairness in your sport", and the few indicates that is "non-existent". This is very concerning because it potentially demonstrates that athletes feel there is no ethics in sport. What is more concerning is why they might feel this way. Is it because they see corruption all around them or is it perhaps because they are engaging in it themselves?

The lack of answers to this question seems to indicate two issues, either they did not want to respond for fear that their employers would find out (and as such may be engaging in corrupt practices) or that the athletes themselves maybe engaged and do not want to draw attention to it. In either case this is further evidence that corruption may be widespread in European sports.

When interviewed about the possibility of reporting the manipulation perceived, only few respondents stated that nothing would prevent them from reporting a manipulation of results in their sport, or competition despite more than half of them believed that those caught match-fixing should face significant sanctions. This may be because players are again aware of significant corruption around them, corruption that is being left undiscovered and unpunished. However, fear of the consequences and lack of confidence in the sports system end up conditioning their decision.

Box 1: The code of silence

One of the reasons usually given for the low percentage of match-fixing reports in the sport word is related to the existence of a code of silence. This happens when sports actors keep silent about irregularities, immorality and even illegalities, that occur in a sporting context.

According to data, this practice exists in national sport and is practiced more by fear than to protect the interests of the group. Only the minority of respondents considered that this practice doesn't exist.

The reasons pointed out by sports people are diverse and vary from class to class. According to the sports actors interviewed, this code is practiced by athletes, clubs, referee councils, sports federations and by some media.

The Olympic athletes practice the code of silence, essentially, for the fear of sporting reprisals. These actors are aware of various irregularities and illegalities that occur in their sport, but the punishments applied to athletes who report in the past, affect new reports in the present.

5.3 To fix or not to fix: consequences and sense of impunity

The conclusion we got is that as far as match-fixing and betting consequences is concerned, players do not see them as a very serious issue and treat it normally. In general, very few respondents admitted that they are betting, but a lot of them commented with normality that they have teammates or colleagues who bet regularly. The intersection of these two responses reveals a fairly pronounced incongruity and raises the doubt that in the first case there was not a completely sincere answer, perhaps precisely for fear of possible effects linked to their declaration.

Their perception of the possible sanctions or repercussions, however, is quite vague and inaccurate. Particularly:

- More than a half of them believed that current penalties are too mild and not harsh enough. This may well be because the respondents are aware of more significant levels of corruption happening around them, corruption that is going unnoticed and/or unpunished. This would seem to indicate that there are perhaps organizational culture issues and/or policies within their clubs which either means the clubs are participating in corrupt practices or that other athletes are engaging because of internal factors within the club;
- A third of them response that penalties are “reasonable”;
- The minority of respondents declared that they “don’t know” or “don’t care” about penalties. This denotes a general lack of awareness of anti-corruption policies in their sport; it also denotes a general lack of education in the area.

However generally they have no awareness of the repercussions that would have to bet or those that would have to fix a match, which indicates that they do not see the risk and that they feel impunity before those actions. If the involvement of a sports actor in a match-fixing case was discovered, respondents considered that the possibility of punishment would be high. But in general, the sense of impunity decreases the act of reporting.

5.4 Solutions perceived

Despite the vague perception that respondents have of possible sanctions and repercussions related to match-fixing, many of them propose possible solutions that, if cannot succeed in blocking the phenomenon, can at least try to stem it. The most common found in the various reports are:

- “To combat the manipulation of results, it is necessary to create an effective, secure and protected reporting system of whistleblowers”. This is a clear indication that there are problems within the club teams, sporting systems, and more than this that match-fixing may be more widespread than indicated. The fact that more than half of those strongly agreed with this solution would seem to indicate that they are aware of widespread corruption, but fear speaking out. This may be because their fear the repercussions as outlined by responses to the second statement here, or because they fear losing their job, and this is something the athletes do not want to risk;
 - Design and deliver of ethical training actions for players and stakeholders;
 - Dedicate efforts to teach what is licit and illicit during courses to the players, because they are a fundamental piece for this type of illicit actions, they cannot be carried out without them. They must know the serious consequences that can generate both for the sport and for themselves to end up immersed in an agreement to fix a match;

Box 2: Portuguese peculiarities

- ✓ Low probability to be discovered and difficulty in building the burden of proof;
- ✓ The sense of impunity retracts the act of reporting;
- ✓ Sports actors are aware of existing protected reporting systems to report safely and effectively..., but rarely report;
- ✓ The code of silence exists and is a common practice in national sports
- ✓ Report is dangerous and could harm out sports career;
- ✓ Need to improve reporting systems.

Box 3: Spanish peculiarities

- ✓ The economic factor seems to be a key element in the decision to manipulate matches or sport events;
- ✓ Sanctions must be worsen;
- ✓ Need for more training among amateur players/athletes;
- ✓ Increase of the manipulation not only of final exit of the match but also other aspects of the game;
- ✓ «Culture of silence» in sport need to be addressed by protecting more the whistler from negative consequences of his reporting;
- ✓ Absence of awareness about reporting systems;
- ✓ Reporting systems must be managed by entrusted organizations, like IOC or International Federations.

- As such, again this reinforces the conclusion that greater training and education are necessary both from the club and externally during the athletes' early career and even during childhood;

- Ensure that human resource practices and policies during selection and recruitment emphasize the importance of ethics and good morals when deciding on new coaches, trainers and management hires. This would help to reduce the chances of unethical decisions, reduce the pressure on athletes and because of the improved ethical fit, generally improve the levels of satisfaction among athletes in the club. This is also important because considerable research has demonstrated that satisfied employees are more productive.

5.5 Protecting reporting systems are needed

As we have seen in the previous paragraphs, the vast majority of respondents admit that love and respect for sport, the need to protect the integrity of the sport, or the defense of ethics and Fair Play, are the three main reasons for reporting a manipulation of results. However, fear of the consequences and lack of confidence in the sports system end up conditioning their decision. Almost a half of respondents believe that report match-fixing is

Box 4: Italian peculiarities

- ✓ Data from "Match-fixing in Italy: a survey" (2013) data collection show that football players are aware of the problem but believe they would not be involve; moreover they underline a lack of procedures or tools for reporting. It emerges the "code of silence" as a possible obstacle to reporting;
- ✓ Data from the report "Qualitative analysis" within the project: "ANTI MATCH-FIXING FORMULA: UNDERSTAND, SHARE, METHODIZE, REPLICATE" (2016) underline the key role of the system established in Italy and the effectiveness of the private-public system but underline also the need to strengthen reporting systems, on one side, and raising awareness among sport actors on the other;
- ✓ Data from interviews in TPREG project show: a lack of trust toward competent authorities for reporting and general lack of a basic comprehension of what a whistle-blowing system actually means;
- ✓ Only if requested, there emerges a growing need about reporting system → coherence between data collected between 2013 and 2018;
- ✓ Top-down approach → Little consciousness about the necessity of working on three levels (individual, group and social-institutional) to be more effective.

dangerous and can harm the sports career of those who do it. As such, always according to the survey, requires the existence of safe and effective protecting reporting systems.

The Article 13 of the Macolin Convention gives the power to member states to establish National Platforms for protected reporting. The National Platform would help to share information between the different stakeholders and would end up in actors getting discovered and punished.

An interesting data of this survey is related to whom, our respondents, should manage an integrated protected reporting system in order to be reliable, effective and secure. The most quoted institution proposed is the police followed by sport federations and the Olympic committees. Below has been found the government and an independent entity of civil society. At the lower end, we find the betting regulators and committees composed of a mix of entities referred.

Box 5: Slovenian peculiarities

- ✓ Lack of knowledge about corruption in sport and consequences/rules;
- ✓ Lack of education is a problem in Slovenian football;
- ✓ Education needs to include family members;
- ✓ Club policies and practices causing dissatisfaction;
- ✓ Clubs maybe engaging in unethical behavior;
- ✓ Club recruitment and selection practices need to emphasize ethics and morals for new employees;
- ✓ A group of individuals engaging in unethical behavior;
- ✓ Widespread match-fixing issues;
- ✓ Internalization and code of silence in Slovenian football.

5.6 Added values and risks of a protected reporting system

From the national reports analyzed emerge a series of added values that a protected reporting system can bring. The most quoted are: security, confidentiality, awareness, protection of information and direct flow of information from the informant to the appropriate authority.

On the contrary, the risks and the disadvantages underlined are: traceability of the informant, misuse, false information, information given to blackmail somebody, anonymity, lack of follow-up and it was also reported that an actor reporting might lose trust or confidence in the sports federation and that information could be covered up.

5.7 Factors that motivate and prevent from reporting match-fixing using a reporting system

During the survey respondents reported several factors that would motivate and prevent from reporting match-fixing using a reporting system.

The most highlighted motivational factors are: personal integrity; purity of the sport; assurance that the information will be delivered to and heard by the appropriate authority; appropriate actions will be taken; the exposure of having a protected reporting system; the official character; the protected character.

The most highlighted preventive factors are: family problems; personal problems; fear of being thrown out of the team; fear of fans turning against them; fear of not getting a new contract; fear of retaliation; threat of organized crime; threat to family; pressure of team mates; psychological pressure; threat of information being leaked; bad examples set by the alike events of corruption at the governing bodies.

5.8 Factors that motivate and prevent from engaging whistleblowing to report a harmful irregularity

From the national reports analyzed emerge that there are factors that both motivate and prevent from engaging whistleblowing to report a harmful irregularity.

The most important reasons that would motivate to engage in whistleblowing to report a harmful irregularity in sport are: love and respect for sport; the need to protect the integrity of the sport; the defense of ethics and Fair Play; legal obligation, self-protection and protection of other sports agents; fear of sanctions for the own career and personal life; fear of being involve in an organized crime scheme.

The most important reasons that would prevent from engaging in whistleblowing to report a harmful irregularity in sport, instead, are: fear of the consequences for the personal and family life; lack of trust in justice –application of criminal sanctions; lack of confidence in the sport system; lack of confidence in the existing reporting systems; lack of security – protection of whistleblowers; fear of reprisals; loss of the confidence of the sport family; fear of being discovered; responsibility and sanction of colleagues/sport agents.

Box 6: Belgium peculiarities

- ✓ During the last 5 years the trend of the perceived incidence of match-fixing both on professional and grassroots level in Belgium is constant;
- ✓ The perceived likelihood of discovery of match-fixing actions is low, but the perceived likelihood of match-fixing being punished, if discovered, is high;
- ✓ Who reported the (last) case of match-fixing they witnessed/suspected, had been primarily to sports federation or colleagues, almost never to police, judiciary or media
- ✓ Primary reasons for not reporting are:
 - Lack of confidence in sports system or application of sports sanctions
 - Lack of confidence in existing reporting systems
 - Lack of security for people reporting match-fixing incidents
 - Lack of trust in justice or application of criminal sanctions

6. General Key Trends and orientative considerations

6.1 More confidential complaint channels and stronger protection of whistleblowers are needed

Reporting systems in sports are increasing within EU Countries. Generally, sports actors recognize that the complaint is the most appropriate act, whenever they become aware of a case of match-fixing. It's a matter of fact that the majority of respondents also stated that "To combat the manipulation of results, it is necessary to create an effective, secure and protected reporting system of whistle-blowers". This fact indicates that they are aware of widespread corruption, but fear speaking out. This is because, as declared, they fear very strong repercussions on their own life, on their family life or because they fear losing their job, and this is something the athletes do not want to risk.

A strong point upon which reflection is needed is linked to the strong presence, which is found in the investigations of each country, of a non-answer to the question related to what is needed to prevent or combat match-fixing. There are a few possible explanations, each more worrying than the next:

- Athletes really are uneducated in what match-fixing and corruption are and simply do not know what can be done to combat it;
- Athletes do not care enough to put any effort into thinking about the problem, they do not see it as something that affects them, or alternatively it is not their job to tackle corruption, so why bother. This is a concern again because it helps to perpetuate the issues surrounding match-fixing and does not consider the role of athletes in the problem;
- Athletes or their clubs are engaging in match-fixing already and do not want to help solve the problem as it would limit their economic benefits and potentially lead to their discovery.

This last possibility is the biggest concern for obvious reasons. But the first two possibilities are equally worrying because they imply that due to the awareness of match-fixing problem and all its implications, the existence and the possibility of making use of reporting systems included, is still limited.

Moreover, there's still a general lack of a basic comprehension of what a whistle-blowing system actually means, as many sports actors consider whistleblowing as a practice that can lead to personal problems. Nevertheless, they perceive a sense of impunity and structural corruption within the world of sport. All these facts imply a double necessity: from one side there should be secure and confidential complaint channels to guarantee trust access mechanisms, and on the other side there should be a clear

explanation of how the protocols work and how it protects the identity of the whistle-blower. Then, a stronger protection of the whistleblowers is needed.

6.2 Awareness through internalization of the problem

Another worrying point, which deserves a dedicated reflection, is the responses given by the majority of interviewed sports people that declare that match-fixing is not something that affects them. This could potentially indicate a few different concerning trends:

- Athletes believe they are invulnerable, that they are in charge of their playing careers and cannot be corrupted;
- Athletes care so little about ethics that they do not see match-fixing as something that would concern them, they will simply do as they want;
- They believe that their club will protect them from any such problems and provide the necessary organizational support;
- They have received little training and education on the matter and as such are unaware of the possible risks.
- It is therefore necessary to dissect each of these possibilities separately.
- Firstly, if athletes do see themselves as invulnerable and incorruptible, then this is a concern, for this likely means that they are unprepared to tackle offers of match-fixing or bribes should they come. They may be unprepared for the temptation; this therefore indicates more education is needed;
- Secondly, if it is a lack of ethics, then this is of course a concern as it may indicate that match-fixing and corruption is taking place and athletes simply do not care. Again the necessary response is ethical training during childhood and the period of early sports training;
- Thirdly, they may believe they are protected by their club, this could account for some of the club loyalty. More than this, in the cases where corruption is revealed, perhaps the clubs have policies that they will handle it internally, thus eliminating the athlete responsibility. This therefore adds to the discussion the points relating to a code of silence and the internalization of the match-fixing problem.

All these possibilities, however, carry with them a common theme: match-fixing is a phenomenon fundamentally experienced as external and not internalized, not taken personally and responsibly charged by the interviewees. A path of awareness, however, cannot be separated from this dimension, which calls into question concepts such as responsibility, personal ethic and professionalism.

6.3 Awareness through training

From the data collection work that has been done, in terms of training, some reflections can be introduced:

- Among sports people, there's a "real" lack of awareness on how to behave in case of match-fixing knowledge;
- There's a "code of silence" issue aimed at an internal management of match-fixing;
- There's a general worry that a self-exposure could lead to a stigmatization.

Form the data, it emerges that even if a lack of an adequate punishment is recognized, training and education are considered key elements in the fight against match-fixing. Moreover, it's necessary not only to train on how to handle a possible match-fixing situation but also on integrity and on the protection of sporting and personal values. It means that it is still needed to engage sports actors at all levels to develop a strong network to enable a strategic and coordinated response to match-fixing.

In terms of training, the fact that sports people are loudly asking for programs of awareness, support and protection against match-fixing represent a starting point. This could be translated in the following points of reflection:

- Why do sports people perceive a lack/need of actions aimed at promoting awareness and integrity assumption?
- Does it mean that current policies aren't properly promoted and shared?
- Does it mean that current polices do not fit properly sport inner dynamics? Which dynamics are perceived as the most relevant/tricky ones?
- Does it mean that policies aren't coherent enough with sports in everyday life? If so, which could be a contact point?
- Is there any kind of awareness about current polices weaknesses and values?

It is important to underline, given these considerations, that in order to raise awareness of the phenomenon of match-fixing to the possible consequences that illegal actions entail and raise awareness on the importance that the use of protected reporting systems, the use of an integrated approach is fundamental. Integrated in term of:

- Levels of involvement: macro/institutional; social, group and individual;

- Scientific disciplines to lean on: psychology, sociology, educational and social sciences, ethics, economics, law and so on;
- Target of training actions: sportspeople, families of sportspeople, team-mates, coaches, trainers, doctors, masseuses, other members of sport associations and sports clubs, stakeholders.

To conclude, raising awareness about illegal behaviours and their consequences is necessary at all levels of sports and cannot be postponed any longer if we want to reach a future change in sports. Nevertheless, there is a general lack of awareness toward match-fixing issue at grassroots level that must be filled up.

We must not forget that regarding possible reactions in case of direct or indirect involvement in illegal behaviours, sportspeople mainly state they would talk with a person inside their club/association while fewer would report to competent authorities. The “code of silence”, that seems to be a peculiarity of sports systems, represents a clear obstacle to whistle-blowing practices. Therefore, it appears necessary to combat such attitudes by raising awareness, educating and training to sport integrity and sport values.

6.4 Open reflections on how to support protected reporting systems

To fully understand how to support and optimize protected reporting systems, it is necessary to reflect in depth on the phenomenon that these mechanisms want to tackle: match-fixing.

The main risk we face, in dealing with match-fixing, is that we could not be able to construct an adequate representation of it and, as a result of this, not to correlate it adequately with other phenomena, with the result that we could work on symptoms rather than on the real causes of phenomenon.

During the previous European research carried out on the topic, we saw how match-fixing risks is being experienced and managed by focusing on three keys. The first is the ethical-moral one, so the proposed solution is to "transmit values" to the subjects involved. The second is the technical one, so the proposed solution is to develop control systems that can solve the problem. The third is the materialistic one, that provides a solution linked to the distribution of forms of economic gratifications that allow the problem to be solved. Today it is increasingly necessary to take a look and be capable of holding these three poles together and putting them in dialogue with each other.

Parallel to the fragmentation of match-fixing interpretations, we are witnessing a polar split of the strategies implemented by the various institutions to face this problem: on the one hand, the contrast strategies, and on the other hand, those linked to preventive mechanisms.

The law enforcement strategies provide for the implementation of repressive remedies. Generally, monitoring mechanisms are activated to identify match-fixing phenomena, involving the police and the

various institutions in an active search for possible perpetrators, as well as the preparatory behaviors for the match-fixing. This in order to already intervene in a phase prior to the commission of the actual crimes. The main aim of these strategies is the "punishment of the guilty" and the extirpation of match-fixing. The tools used are: the creation of an ad hoc public structure that analyzes the dynamics of betting; economize on experiences; generate a greater flow of information in the legal network; strengthen public-private partnerships; improve dialogue and communication between actors; provide for implementation remedies. The channel used is mainly the legislative one, which intervenes not only on the repression of the match-fixing as on the implementation of established rules and norms. A risk is inherent in this approach: these rules, due to their complexity or, on the contrary, to their relative generality in dealing with ever more complex phenomena, could favor rather than contrast the match-fixing. Even the absence of certain rules could be a facilitating factor of it.

In preventive strategies, instead, attention is focused on individuals: they act on the behavior of individuals within institutions and sports events trying to promote ethical and behavioral codes that make the choice of loyalty a choice "of conscience". The goal is to create individual preventive "antibodies" that avoid giving into the temptation of match-fixing. In other words, they tend to create a stimulus to the individual conscience because only these kinds of "virtuous" behaviors are able to modify the culture of an entire environment, making the phenomenon of the match-fixing marginal, if not impossible, to implement. The tools used on average for this approach are: to promote and protect the culture of integrity and legality; to implement programs of training of transmissive anti-corruption approach; to reduce contacts between betting managers and sports "actors"; to make an immediate review of controversial decisions and monitor the presence of players and referees in suspicious games.

We therefore attest to the presence of strategies to which very different paradigms are subtended: in those of contrast there is a retrieval to control, linked to an ethical and moral system, which is exercised through the law; in the preventive ones, on the contrary, the focus is on the attention to aspects of personal and ethical responsibility linked to an individual plan.

The putting into practice of these two approaches is the one that generated the explication of the current situation, analyzed in depth during the research work that was carried out in our project. This is characterized by what we have called "the code of silence", a code that is born and developed within a "culture of silence" that characterizes the world of sports. The characteristics of this culture can easily be seen from the research results presented above, which, for summarizing, is characterized by the psychological tendency of individuals to distance themselves from the responsibility of the criminal act, to the perception of a sense of strong solitude, of insecurity and a sense of not enough protection. This context leads people to move away from the problem of match-fixing and to develop reticent reactions to the reporting, although "protected", of the phenomenon.

From this context is born the current general perception that sports have a poor ethos of regulation, a rise of the tolerance of conflicts of interest, the emergence of the tendency to ignore bad practices and such a presence of omertà, so as to be able to say that "on the day of today, corruption is often considered "normal", not problematic and taken for granted" (Numerato, 2015).

Therefore, we should move from a "culture of silence" to a "culture of coexistence and sharing", in which the individual, the sportsman, the coach, the manager is not left alone. In this perspective, each of them can be included in an organizational network that shares information, knowledge, awareness and ethical approaches. In this scenario, the match-fixing phenomenon must be considered not as an object to be repudiated and dismissed, but on the contrary, to be approached and known, in order to be able to fight it.

To do this, we need to act on what is called the "intermediate level", that is on the "group level" and "in the organizations". Nowadays, it is not yet sufficiently taken into consideration. Therefore, the group must become the central plan on which to work with sports organizations (federations, leagues, teams ...) and with whom it belongs (coaches, managers, athletes ...).

It should also be kept in mind that the "culture of silence" is facilitated if there are devices that, although effective, are still little known and accepted. We should therefore work in parallel with the strengthening and empowerment of protected reporting, and also with the creation and dissemination of other strategies that work on groups and organizations, implicitly going to support and strengthen the reporting mechanism itself. These strategies, to move towards a "culture of coexistence and sharing" will:

- Act on organizations in terms of analysis and organizational interventions;
- Organize group training moments, including in the action's categories such as coaches and managers, that generate awareness and develop a strong sensitivity to catch the match-fixing signals, be they strong or weak. There is a need for non-transmissive training that goes to work on the "culture of reporting" that weaves the personal, organizational and ethical levels. Bearing in mind that a job of this type would intrinsically improve the quality of sports organizations and the sports that emerges from them;
- Share the tools available and which will gradually emerge from these activities.

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