

ENSURING THAT INTEGRITY IS AT THE CORE OF SPORT'S RESPONSE TO THE PANDEMIC:

PREVENTING CORRUPTION IN SPORT AND MANIPULATION OF COMPETITIONS

Background

On 11 March 2020, the World Health Organization (WHO) announced that the current outbreak of the coronavirus disease 2019 (COVID-19), a respiratory illness caused by the Severe Acute respiratory Syndrome Coronavirus 2 (SARS-CoV-2), is a pandemic¹.

In response to this outbreak, countries have taken a broad range of measures to contain and mitigate the spread of the virus, including decrees that mandate “social distancing”, leading to a significant slowdown of global economic activity and a “lockdown” for sport competitions.

The temporary absence of sport events does not necessarily eliminate sports integrity issues such as addressing corruption in sport and specifically preventing the manipulation of competitions. At the same time, the re-starting of competitions and events after the crisis, requires extra preventative measures and vigilance.

A global response

The 2030 Agenda for Sustainable Development, recognized sport as an important enabler of sustainable development, highlighting its growing contribution to the realization of development and peace in its promotion of tolerance and respect.

Member States, the United Nations system, international sport federations and other stakeholders are establishing frameworks for collaborative action on sport, physical activity and

active play that use sport as a platform for achieving wider development outcomes rather than focusing on sport as an end in itself. The frameworks for action feature a wide range of goals, including personal and interpersonal social development, health promotion, conflict resolution, intercultural dialogue, social inclusion and economic development².

The pandemic threatens the positive contribution that sport plays as the world faces some of the greatest levels of uncertainty seen in many decades as the world grapples with health and economic crises caused by the pandemic.

Placing the integrity of sport at the center of any response is key to ensuring that sport emerges from this challenge as strong as possible.

This paper looks to set out a policy framework and playbook of recommendations for those involved in the context of addressing corruption in sport and preventing the manipulation of competitions. The document draws from the United Nations Convention against Corruption³ and relevant resolutions⁴ adopted by the Conference of the States parties to the United Nations Convention against Corruption adopted respectively at its Seventh and Eighth Sessions, as well as the fundamental principles of Olympism, as reflected in the Olympic Charter⁵.

It is also based on the experiences of the International Olympic Committee (IOC), the International Criminal Police Organisation (INTERPOL) and the United Nations Office on Drugs and Crime (UNODC) working with experts, partners, government officials and relevant stakeholders in the above fields.

¹ <https://www.who.int/dg/speeches/detail/who-director-general-s-opening-remarks-at-the-media-briefing-on-covid-19---11-march-2020>

² <https://undocs.org/en/A/73/325>

³ <https://www.unodc.org/unodc/en/treaties/CAC/>

⁴ <https://www.unodc.org/unodc/en/safeguardingsport/international-legal-framework.html>

⁵ <https://www.olympic.org/documents/olympic-charter>



INTEGRITY AT THE CORE OF SPORT'S RESPONSE TO THE PANDEMIC

As decision makers and officials working in sport are providing responses to the crisis in the short-term, the next phase in overcoming the pandemic will also require the development of a “new normal”, a new way of working.

For those whose decisions to address the pandemic will impact sport, it is crucial that the steps taken now do not close off options later.

Ensuring that the integrity of sport is at the core of the “new normal” for sport is essential for it to emerge from the pandemic ready to play its crucial role in society. Therefore, safeguarding the integrity of sport in these challenging times is to invest in its future potential.

It is therefore recommended to all relevant stakeholders to ensure that the fight against corruption in sport and specifically preventing the manipulation of competitions, is part of any responses to the pandemic and remains a priority in their post-pandemic era.

Playbook responses

As sport deals with the immediate crisis and starts to approach the “new normal”, there is an opportunity to learn from the past and be proactive about next steps in addressing corruption in sport and specifically preventing the manipulation of competitions.

The following suggested recommendations look to support actions that are of particular relevance to the current situation, although they remain valid in general terms.

They are put forward for the consideration of Governments, primarily law enforcement agencies and criminal justice authorities, and sport organizations, but are also relevant for other stakeholders, namely sports betting entities, academia and civil society organizations.

1. RESPONSES FOR THE IMMEDIATE SITUATION

Overarching recommendations

i) **Developing tools to detect and report corruption in sport and prevent the manipulation of competitions.**

As salaries of sports professionals may be impacted, through reductions or delays in payments, and the economic situation places pressure on sport, criminal groups and corruptors may seek to exploit this situation to gain influence. Those involved in anti-corruption in sport and specifically the prevention of the manipulation of competitions might be using this period to strengthen and enhance their existing networks, as well as to make new approaches.

It is recommended to the extent possible, to consider avoiding decreasing salaries of those most vulnerable and severely affected and if required to make these temporary whenever possible. In order to facilitate reporting of approaches by criminal groups and corruptors, or wrongdoing in general, it is further recommended to develop and implement reporting mechanisms in sport, or to promote existing mechanisms among relevant stakeholders. If salary decreases are implemented for top athletes, it is also recommended that the ensuing savings be used to support the most vulnerable and severely affected athletes, sports organizations and related employees.



Relevant tools include:

- IOC and UNODC publication “Reporting Mechanisms in Sport: A Practical Guide for Development and Implementation” which can be accessed through:

www.unodc.org/unodc/en/safeguardingsport/resources.html

- IOC Integrity Reporting Mechanisms which could be used as a model by National Olympic Committees and International Federations, which can be accessed through:

www.olympic.org/integrityhotline

ii) Ensuring that support provided to sport is used for its intended purposes.

The world of sport also constitutes a multibillion-dollar industry, employing vast numbers across many interlinked sectors including marketing, tourism, media, sponsorship, events management and clothing, to name but a few.

Many sports organizations and associated businesses and associations have been profoundly affected by the global crisis and require rapid, direct assistance⁶, without which some may find it difficult, if not impossible, to recover during the post-pandemic phase.

It is recommended, to the extent feasible, that in order to prevent corruption and fraud, governments, sports organizations and related stakeholders which are looking to support sport in this time of need, develop and implement clear, objective and

transparent criteria to ensure that those in greatest need of assistance qualify for and receive it.

iii) Preventing corruption in sport and specifically the manipulation of competitions by continuing to raise awareness about these risks.

Faced with immediate risks and threats posed by the pandemic, it is important to maintain and raise awareness about the risks of corruption in sport and specifically the prevention of the manipulation of competitions. This is an effective prevention measure for when sport resumes.

It is recommended, during these times to continue, and increase where possible, the organization of awareness-raising sessions for officials from relevant government entities, sports organizations, and related stakeholders, and by way of modern teleconferencing technology, whenever feasible.

Relevant tools include:

- INTERPOL and IOC Handbook on Competition Manipulation provides stakeholders with key information on how to protect the clean athletes from competition manipulation, while also outlining ways how sports organisations, law enforcement agencies and government can cooperate effectively.

<https://stillmed.olympic.org/media/Document%20Library/OlympicOrg/IOC/What-We-Do/Protecting-Clean-Athletes/Betting/Education-Awareness-raising/Interpol-IOC-Handbook-on-Protecting-Sport-from-Competition-Manipulation.pdf>

⁶ The IOC has put in place a dedicated fund to support sport organisations: <https://www.olympic.org/news/ioc-approves-a-financial-envelope-of-up-to-usd-800-million-to-address-the-covid-19-crisis>



Specific Recommendations for sport organizations

It is recommended to use this time to adopt relevant regulations notably in relation to prohibitions of betting on one's sport, sharing inside information, corrupt conduct/competition manipulations, obligation to report.

It is recommended to ensure that anti-bribery regulations of sport organisations are well respected and implemented and in case of a potential breach effectively investigated in the view of disciplinary actions. As examples, the respect of regulations in relation to conflict of interest as well as on fair procurement must be ensured and not compromised during the pandemic and the recovery follow-up process;

It is recommended to intensify awareness-raising sessions for the athletes, their entourage and sport organisations' officials. Notably, during this special period, virtual awareness-raising activities can be planned.

Relevant tools and information include:

- Olympic Movement Code on the Prevention of the Manipulation of Competitions can be accessed at:

https://stillmed.olympic.org/Documents/Commissions_PDFfiles/Ethics/olympic_movement_code_on_the_prevention_of_the_manipulation_of_competitions-2015-en.pdf

- Virtual awareness-raising activities can be planned, e.g. for the implementation of the Code of Conduct and can be supported by the Olympic Movement Unit on the Prevention of the Manipulation of Competition ("OM Unit PMC").
- The INTERPOL and IOC Handbook on Conducting Fact Finding Inquiries, and dedicated training, provide sports integrity investigators with the skills to conduct effective Sports Integrity Investigations:

<https://stillmed.olympic.org/media/Document%20Library/OlympicOrg/IOC/What-We-Do/Protecting-Clean-Athletes/Betting/Education-Awareness-raising/Interpol-Handbook-on-Conducting-Fact-Finding-Inquires-Into-Breaches-of-Sports-Integrity.pdf>

Specific recommendations for governments, in particular, law enforcement and criminal justice authorities

It is recommended that, where possible, relevant authorities be provided with resources needed to help address the problem and look to engage and coordinate with the INTERPOL's Match-Fixing Taskforce (IMFTF) when conducting investigations

It is recommended to consider, where feasible, sharing information received with the respective sports authorities,



keeping in mind that a law enforcement investigation and a disciplinary investigation should, to the extent possible, be run in parallel and in a coordinated manner.

Relevant initiatives include:

- INTERPOL Match-Fixing Taskforce. More information can be found through: www.interpol.int/en/Contacts/Contact-IMFTF

The INTERPOL Match-Fixing Task Force (IMFTF) brings together law enforcement agencies from around the world to tackle competition manipulation and corruption in sport.

IMFTF supports member countries in competition manipulation investigations, and maintain a global network of match-fixing investigators so they can share information, intelligence and best practices. IMFTF also collects, analyses and stores information to this end.

IMFTF has been closely monitoring the impact of the pandemic through information exchange, alerts and notices.

The IMFTF currently has 90 members with more than 130 national points of contact worldwide. This network allows the task force to act as a platform for cross-border investigations and international case coordination, with meetings and webinars held regularly.

IMFTF is also supporting the implementation of the Council of Europe Convention on the Manipulation of Sports Competitions (Macolin Convention) and action by law enforcement authorities in particular, as well as the work of the Group of Copenhagen and national platforms in addressing competition manipulation.

- The International Partnership Against Corruption in Sport's (IPACS) Task Force on Enhancing Cooperation between Law Enforcement, Criminal Justice Authorities and Sport Organizations. More information can be found through: www.ipacs.sport/cross-sector-cooperation

2. RESPONSES FOR THE FUTURE

As sport recovers from the impact of the pandemic, any traditional sources of sustainable financing and revenues need to be properly and sustainably safeguarded. All revenues and financing, whatever the origin, including from sports betting (a portion of which goes to support sport, and which generate taxes for several governments), are not jeopardised by any illegal or illicit activities.

i) Ensuring regulations and legislation are in place to help tackle corruption in sport and the manipulation of competitions

It is recommended, to periodically evaluate national policies, practices and national laws, with a view to determining their efficiency and effectiveness in preventing and combating corruption in sport and the manipulation of competitions.

It is recommended to enforce national legislation criminalizing bribery and other forms of corruption, by preventing, investigating and prosecuting corrupt acts involved in sports, and that these be coordinated when feasible with sporting bodies conducting related disciplinary measures.



Relevant tools include:

- IOC and UNODC Model Criminal Law Provisions for the prosecution of competition manipulations (2016) can be accessed at: www.unodc.org/unodc/en/safeguardingsport/resources.html

ii) Developing an effective national cooperation framework between law enforcement, criminal justice authorities and sport organizations

Promoting cooperation, coordination and exchange of information among relevant government entities, in particular law enforcement and criminal justice authorities, and between sports governing bodies, and sports betting entities in addressing the manipulation of competition is key to help detect, investigate, prosecute and disrupt.

It is recommended that all relevant stakeholders, in particular law enforcement, and criminal justice authorities and sport organizations, to establish formal institutional frameworks and processes, and implement operative paragraph 8⁷ of resolution 8/4 on Safeguarding Sport from Corruption. This is also foreseen by article 13 of the Council of Europe Convention on the Manipulation of Sport Competitions⁸.

What support is available?

- ▶ **The Olympic Movement Unit** on the Prevention of the Manipulation of Competitions (OM Unit PMC) is tasked with coordinating, supporting, monitoring and promoting the fight against competition manipulation. One of the Unit's core activities is to monitor the implementation of the Code

by sports organizations. The OM Unit PMC has developed model rules to support federations and events organisers with adopting relevant rules. The Unit has also developed a wide range of awareness-raising tools to support its stakeholders with educating athletes and entourage.

For further information please contact:
omunitpmc@olympic.org

- ▶ **UNODC's** specialized subject-matter experts in the implementation the United Nations Convention against Corruption⁸, based both at its headquarters in Vienna and in its network of field-based advisers, support the implementation of relevant commitments by Governments, sports organizations and related stakeholders through its programme on safeguarding Sport from Corruption and Crime.

For further information please contact: uncac.sport@un.org

- ▶ **INTERPOL Integrity in Sport** helps international efforts across its 194 member countries to prevent the manipulation of sporting events and illegal gambling by criminal groups. The INTERPOL Match-Fixing Taskforce bringing together LEAs across the world can support information exchange and case coordination.

For further information and support, please contact:
IMFTF@interpol.int

- ▶ The **IOC - INTERPOL Global Capacity Building and Training Programme** delivers tailored workshops and webinars around the world to support National Olympic Committees, International

⁷ 8. Calls upon States parties, where possible and in accordance with the fundamental principles of their legal systems, to inform the Secretariat of the names and addresses of authorities that may be able to assist other States parties in developing and implementing specific measures to address corruption in sport;

⁸ More information can be found here: <https://www.coe.int/en/web/sport/manipulation-of-sports-competitions>



and National Sports Federations, law-enforcement agencies, government entities and betting regulators and operators in addressing competition manipulation and related corruption. The programme offers training to law enforcement investigators, sports investigators, national and regional workshops and meetings to develop a national cooperation platform

For further information please contact:
omunitpmc@olympic.org or integrityinsports@interpol.int

► **IPACS** was launched at the IOC's International Forum on Sport Integrity (IFSI) held in February 2017. It is a multi-stakeholder platform with the mission "to bring together international sports organisations, governments, inter-governmental organisations, and other relevant stakeholders to strengthen and support efforts to eliminate corruption and promote a culture of good governance in and around sport"

Its four Task Forces focus on:

- reducing the risk of corruption in procurement relating to sporting events and infrastructure;
- ensuring integrity in the selection of major sporting events, with an initial focus on managing conflicts of interests;

- optimising the processes of compliance with good governance principles to mitigate the risk of corruption; and
- enhancing effective cooperation between law enforcement, criminal justice authorities and sport organisations.

For further information, please contact:
to-contact-us@ipacs.sport

Relevant Websites:

- International Olympic Committee: <https://www.olympic.org/prevention-competition-manipulation>
- INTERPOL: www.interpol.int/Crimes/Corruption/Corruption-in-sport
- UNODC: www.unodc.org/unodc/safeguardingsport/index.html
- IPACS: www.ipacs.sport