



Combating Match Fixing in Club Football Non-Competitive Matches

Final Project Report

Project: 603138-EPP-1-2018-1-CY-SPO-SCP



Co-funded by the
Erasmus+ Programme
of the European Union



UNIVERSITY of NICOSIA
RESEARCH FOUNDATION



"We were losing a friendly 2-0 at half-time so the owner said you may as well let in another two goals."

“Friendly matches were a different story altogether because I would be watching the game from the bookies corner so, when there were changes in my plans, I would page my players at half-time from a payphone in a nearby cafeteria and they would call me back. Then I would instruct them on the number of goals that I needed. Done. The money was usually handed out after the match at the same cafeteria.

Convicted match-fixer Wilson Raj Perumal.¹

COMBATING MATCH FIXING IN CLUB FOOTBALL NON-COMPETITIVE MATCHES

Contents

P. 4	Introduction & Overview
P. 7	Current National, International, and Global Regulation
P. 10	Player Surveys
P. 14	Role of Player Unions
P. 16	Suspicious Friendly Matches
P. 24	Training Camps and Friendly Tournaments
P. 30	Case Study
P. 34	Categorisation and Methodology of Fixing a Friendly
P. 37	Possible Non-betting Related Reasons for Manipulating a Friendly
P. 39	The Global Betting Market
P. 43	Role of Betting Operators and European Betting Regulation
P. 45	Role of Data Providers
P. 49	Role of National Platforms, Interpol and Europol Data Standards
P. 51	Conclusions
P. 58	Recommendations
P. 60	Appendices, methodology and needs analysis

INTRODUCTION & OVERVIEW

The aim of this project was or has been to fully understand the issue of manipulation in non-competitive matches – hereafter described as friendlies – which are an increasingly important part of the football industry in terms of player development, globalising the fanbase for larger transnational clubs and in providing product for betting companies. A lack of oversight by the sport's regulators leads to the impression that governance is not important for the majority of club friendlies and this project explores what governance exists, the role of existing stakeholders and how friendlies are exploited by match-fixers.

For transnational clubs from competitions such as the English Premier League and Spanish La Liga, friendly matches are as focused on growing an international fanbase as preparations for the new season. For the latter reason, clubs throughout Europe play thousands of friendly games every year, notably within the framework of pre-season and training camps in both summer and winter when leagues take a break.

These games are not only an important part of the sporting calendar, but also have financial stakes, in particular from the perspective of betting. As underlined in this report, there is a growing body of evidence showing an increase of match-fixing in friendlies.

Bogus international matches have been organised by fixers since at least 2010. The first public case occurred when a fake Togo international team played international matches to defraud betting companies. This prompted a response from FIFA, which in 2011 pledged to tighten the rules around these games.²

Since then, however, there has been no concerted action to tackle match-fixing club

friendlies and alerts from betting monitoring bodies for suspicious betting movements have increased and outperformed the average for competitive matches in 2017 and 2018 according to data from STATS Perform and Star Lizard. This was even before the COVID-19 outbreak, when friendly matches were the only games available to try and corrupt during the spring and summer of 2020.

The reasons for this increase are varied and complicated, but the status of friendlies at most levels of the sport has created an impression that these matches do not matter either at a sporting level or in terms of governance. There is little regulation of friendlies at club level and the few guidelines that do exist are only sporadically enforced.

In common with a growing trend of recent sporting manipulations, the problem is at the lower level of the professional and semi-professional club game, where more matches are already coming under suspicion but cases are not making it to the Court of Arbitration for Sport (CAS), due to the high threshold of proof required to uphold a match-fixing charge.³ Clubs in many smaller European leagues are easier to infiltrate due to endemic financial weakness. In 2020, for example, UEFA noted:

*"Given the number of clubs spending at least €6 for every €5 they make (i.e., with loss margins in excess of 20%), there appears to be a continued reliance on benefactors and occasional income from transfers and training compensation. Indeed, there are a number of countries where profitability remains the exception, rather than the rule."*⁴

Figure 1. Suspicious matches by type

Match type	2017 (%)	2018 (%)
Friendlies	1.20	2.00
All Games	0.73	0.61

² <https://www.reuters.com/article/uk-soccer-fifa-friendlies-idUKTRE7225KL20110304>

³ <http://www.sportsintegrityinitiative.com/tackling-match-fixing-threat-posed-lower-tiers/>

⁴ UEFA Club Licensing Benchmarking Report (2020), p115.

This financial instability and the lack of governance makes friendly games easier to corrupt, particularly in Europe, where the involvement of organised crime groups in sporting manipulation is also increasing. In 2020, Europol noted that: “OCGs predominantly target sporting competitions matching the profile of lower level competitions across different sports.”⁵

Additionally, there are unsuitable owners or outside investors, such as organised crime groups (OCGs), seeking to taking advantage of the financial weakness at the lower level of the European game. As stated by many interviewees, they see friendlies as easier to corrupt, particularly given the lack of sporting or criminal sanctions for any incidences of manipulation.

Due to the reduced profile of friendly matches generally and the involvement of lower level clubs, these problems are only rarely covered in the media and usually result in little or no

Incidences of manipulation of friendlies began to increase at the turn of the last decade. According to betting monitoring group Federbet, there were 11 club friendly matches played in Europe where they monitored suspicious betting activity between January and May 2014.⁶ These games involved clubs from Bulgaria, China, the Czech Republic, Finland, Lithuania, the Netherlands, Norway, and Sweden.

Between September 2014 and January 2015, Federbet reported another eight friendlies involving clubs from Albania, Armenia, the Czech Republic, England, Germany, Italy, Latvia, Russia, Portugal, and Slovakia where suspicious betting activity indicated potential match manipulation.⁷ One of these games was a ‘ghost’ friendly, which did not actually take place and was created by corrupted data scouts to defraud betting companies.⁸

In January 2015, the International Centre for Sports Security (ICSS) warned of a criminal



action being taken by the respective governing authorities. Nonetheless, evidence of the problem exists.

Some suspicious games attract headlines in the media but there are rarely follow-up stories about if and how players, clubs, officials or outside actors are prosecuted and sanctioned for these incidences.

gang operating in southern Spain after investigating matches between ADO Den Haag of the Netherlands and Albanian champion Skënderbeu Korçë in Estepona, as well as another game between Dutch club Heerenveen and Belgian side Standard Liège in Murcia, which had been manipulated.^{9 10} Between November 2010 and April 2016, UEFA's Betting

⁵ The Involvement of Organised Crime Groups in Sports Corruption: Situation Report. Europol (2020), p4

⁶ Federbet Annual Fixed Matches Report (2014)

⁷ Federbet Annual Fixed Matches Report (2015)

⁸ <https://www.bloomberg.com/news/articles/2014-08-12/soccer-bookmakers-pulled-bets-twice-in-2014-on-false-data>

⁹ <http://www.dutchnews.nl/news/archives/2015/01/match-fixing-claims-about-dutch-club-friendlies-in-spain/> The Standard Liege vs Heerenveen game can be viewed here: https://www.youtube.com/watch?v=xrLn6r_w-V0

¹⁰ This ICSS report into this investigation was not made public but this project has a copy.

Fraud Detection System identified 53 matches involving Skënderbeu Korçë that were allegedly manipulated for betting purposes.¹¹ These matches included club friendlies, which the club's president is alleged to have been 'targeting' for 'illegal gain'.

The lack of regulation and governance around friendlies is best illustrated by an incident in 2014, when English club Norwich City beat Italian Serie D club Saint-Christophe Vallée d'Aoste 13-0 in a friendly match only to subsequently discover that their opponents were not the Serie D club, but a regional select from the Aosta hastily assembled after the real club was unavailable.¹²

This lack of transparency around friendlies allows for the creation of fixtures simply to defraud betting companies. In August 2014, Betfair suspended betting on a friendly in Portugal involving SC Freamunde after which their supposed opponents, SD Ponferradina, denied involvement in the game.¹³ In 2015, SBOBET and Bet365 took bets on a friendly between two Belarusian clubs, FC Slutsk and Shakhtor Soligorsk, that never took place.¹⁴

Between July 2016 and February 2016, Federbet identified another nine club friendlies played in Europe where suspicious movements on betting markets suggested that manipulation was likely. These games involved clubs from Azerbaijan, Croatia, Cyprus, Greece, Germany, Hungary, Romania, and Turkey.¹⁵

Friendlies are sometimes organised into privately-run tournaments and these are also vulnerable to manipulation due to lack of organised integrity. In January 2017, a match in the Baltic Winter Cup tournament between Latvian club Babite and Lithuanian team Marijampole Suduva was allegedly fixed.¹⁶ The Latvian Football Federation launched an investigation and Babite were subsequently expelled from the Latvian Virsliga.

Appointment of officials for fixtures organised by private tour operators and match agents is another area of weakness. In 2017, five matches involving Romanian clubs playing in Cyprus and Spain were cited in an investigation by Romanian media outlet Gazeta Sporturilor, which uncovered that the Bulgarian referees assigned to the game were in fact Romanians.¹⁷ A gang of match-fixers had disguised their identity to try and cover up fixes.¹⁸ Concerns over friendly games in Cyprus are so great that data monitoring company RunningBall – now part of the STATS Perform Group, then just part of Perform – stopped coverage of these games in 2017.

These are only a few examples illustrating a genuine need for the issue of fixing in friendly club football matches to be the subject of serious analysis and solutions in terms of governance reform and educational tools to be developed to combat the problem.

¹¹ <https://www.theguardian.com/sport/2018/mar/19/match-fixing-skenderbeu-albania-uefa-report-ban>

¹² 'Norwich City forced to apologise for reporting on the wrong opponents in bizarre pre-season dispute with local Italian side' Mailonline, 25 July 2014.

¹³ <http://www.sportsintegrityinitiative.com/portuguese-football-league-reports-federbet-over-fixing-claims/>

¹⁴ <http://www.sportsintegrityinitiative.com/the-ghost-game-phenomenon/>

¹⁵ Federbet Annual Fixed Matches Report (2016)

¹⁶ <http://www.baltic-course.com/eng/legislation/?doc=127614>

¹⁷ 'The Romanian Network – the Story of Dubious Friendly Matches' Futbolgrad 27 January 2017.

¹⁸ <http://futebolgrad.com/romanian-network-dubious-friendly-matches/>

CURRENT NATIONAL, INTERNATIONAL AND GLOBAL REGULATION

Sport's governing bodies have been slow to recognise the importance of regulation of friendlies. Currently, the level of regulation varies drastically from country to country within Europe. This ranges from total lack of regulation within certain countries/regions to the Deutscher Fußball-Bund (DFB) using two specialised companies to monitor friendlies involving Bundesliga clubs and a tacit agreement by many Scandinavian clubs to avoid perceived problem areas, such as Turkey, according to sources in the region interviewed for this report.

Intervention over the staging of club friendlies by national, continental and international bodies has been limited to safety or political reasons. In 1983, Liverpool and Manchester United were deterred by FIFA from playing in a tournament in South Africa, which was then in sporting isolation due to the country's apartheid policy.¹⁹ In 1987, the Football Association of England prevented Leeds United from playing in a friendly tournament in West Germany due to concerns over hooliganism.²⁰ In 2008, English club Luton Town visited the unrecognised Turkish Republic of Northern Cyprus and planned a friendly against local club Cetinkaya, which was subsequently cancelled after complaints to FIFA by the Cyprus Football Association.²¹

Action against match manipulation in club friendlies is sporadic despite the fact that investigating allegations of match-fixing in football is vital to maintaining participant and stakeholder confidence in the game. Indeed, the manipulation of football matches to make money from betting markets affects the very essence of the principle of loyalty, integrity, and sportsmanship.

In general terms, the responsibility for tackling these issues rests with the relevant governing body. In the case of club-level football, it is the national association. For national team-level matches, it is either UEFA for Europe or FIFA worldwide. This responsibility includes friendly matches as the reputational damage is the same, although the reality is that they do not

receive the same level of response, certainly at club level.

Most incidences of match-fixing in football are likely to involve the commission of a crime, especially when fraudulently making money from betting is the reason for the fix. As a consequence, investigating such matters are responsibility of the police or other public bodies entitled to enforce the law of the land. Additionally, football governing bodies generally do not have the in-house resources (or skill levels) to investigate such allegations.

However, it is rarely straightforward persuading European police forces/law-enforcement agencies to become involved in such investigations. An important question in this regard is whether investigating and combating match-fixing in football is in the public interest in that particular country compared to other crimes? Therefore, it does not receive the policy response and resource attention it needs. This is especially true when the suspicious games are club friendlies. This combination of lack of regulation and investigation suggests that these games are not considered by the football and judicial authorities to be real football matches.

Additionally, match-fixing is an idiosyncratic offence, meaning that the legislation in place across Europe can either help or hinder an investigation depending on the country. By way of example, the British Gambling Act includes a provision of cheating at gambling which can be used for betting related match-fixing. Only a handful of countries have more specific provisions for match-fixing in their criminal codes.²² A 2013 study by the United Nations and the International Olympic Committee found that only five of the 19 states studied had established specific or ad hoc criminal offences for match-fixing, a number of these have, in the meantime, amended or reviewed relevant legislation.²³ Paradoxically, some of the countries (such as Portugal and Germany) that do have legislation to deal specifically with match-fixing, do not extend it to friendly matches.

¹⁹ *Manchester United: The Forgotten Fixtures* (Breedon Publishing: 2009), p245.

²⁰ 'Bans keep Leeds at home', *The Times* 22/7/1987.

²¹ 'Norther Exposure', *World Soccer* December 2008.

²² *Match-fixing in sport: A mapping of criminal law provisions in EU 27*, KEA European Affairs, March 2012 http://ec.europa.eu/sport/library/studies/study-sports-fraud-final-version_en.pdf

²³ *Model Criminal Law Provisions for the Prosecution of Competition Manipulation* (2013, UNODC/IOC)

There is some international United Nations legislation that can be of help to law-enforcement across Europe when investigating match-fixing, notably the United Nations Convention against Transnational Organized Crime (UNTOC) which carries 147 signatories and 185 state parties.²⁴ The purpose of UNTOC is to, “promote cooperation to prevent and combat transnational organized crime more effectively.” UNTOC can only be used by public bodies and is targeted especially at law enforcement.

One element of the UNTOC which investigators need to be aware of at the outset is the definition of what constitutes an ‘organized criminal group’. Article 5 of UNTOC reads:

“Shall mean a structured group of three or more persons, existing for a period of time and acting in concert with the aim of committing one or more serious crimes or offences established in accordance with this Convention, in order to obtain, directly or indirectly, a financial or other material benefit”.

This definition encompasses a wider range of match-fixing activities due to the fact that only “three or more persons” have to be involved, whereas in a number of countries organised crime groups are viewed more as a network typically much larger than three persons involved in serious criminality. However, three or more people are likely to have been involved in most match-fixing enterprises.

A further inhibitor is the jurisdiction issue. When an incident of match-fixing in football crosses borders inevitably the two countries with a link to the allegations will have different approaches to investigating this type of crime. In the first instance, it is likely the investigation will be carried out by the police force of the country where the match takes place.

In essence, this is a question of which state or country can exercise jurisdiction, based upon the preliminary presumption that, if possible, a prosecution should take place in the jurisdiction where the main element of the corruption occurred. However, this presumption could be rebutted by the location of the accused at the time the fixing is discovered and whether or not they can be detained or even extradited.

Another consideration is the judicial/court

process of the country including the amount of time taken to hear the case and the sentencing powers of the court should the accused be found guilty of the match-fixing offence.

Securing the attendance of witnesses would also be a key consideration for the case moving forward. Where organized crime is involved, there are unlikely to be many, if any, witnesses who come forward without the promise of robust protection of their identity and safety. Without witnesses, giving testimony under oath a criminal conviction for match-fixing offences are more difficult to secure.

With all these complexities, detection, disruption and deterrence of match-fixing in football by state bodies is generally low and has the consequence that criminal prosecutions for match-fixing in football is still relatively rare – and even more so when it comes to successfully prosecuting match-fixing in friendlies. For example, the investigation by Bochum police into a major match-fixing ring in Germany took four years to reach court after arrests in 2009.

National association survey

As part of the project, a survey was carried out in April 2021 of national associations asking about their rules governing regulation of friendly matches. A brief questionnaire featuring five questions (see appendix 2) was sent to all 55 members of UEFA and 21 responses were received. Given the nature of some replies and the wider lack of governance surrounding friendly matches, the level of responses was perhaps reflective of some associations being unable rather than unwilling to co-operate. Details on which associations did and did not respond is at the end of this section.

The results showed that 76% of associations required notification from clubs before these clubs went abroad to play friendly matches. However, given the level of responses, it would be unwise to assume from this response that three quarters of all UEFA members require notification from their clubs of overseas trips for training camps.

In comments with responses, some federations also acknowledged that friendlies are more prone to manipulation. For example, the Norwegian Football Federation commented:

“There is no formal requirement that clubs going abroad to play friendlies notify NFF

²⁴ United Nations Convention against Transnational Organized Crime parties, [treaties.un.org](https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=XVIII-12&chapter=18&lang=en)
https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=XVIII-12&chapter=18&lang=en

about this. In practice, at least for clubs belonging to the top tiers of Norwegian football, NFF still keep track on the clubs' activity abroad, both regarding opponents and officials. This is due to fact (sic) that NFF for many years have subsidised clubs' preseason camps in places like La Manga and Marbella.

"NFF has usually been part of the organising committee for friendly tournaments played during these camps. NFF has also used these tournaments as training camps for Norwegian referees. We acknowledge however that also these tournaments have integrity concerns."

The notice required before playing these overseas games ranged from 60 days (England) to no notice (Cyprus). The bulk of respondents requiring notice asked for between seven and 14 days, but there was a significant difference between countries where clubs were required to give notice of overseas friendlies and the amount of information on these games that had to be provided to the national governing body (NGB). Only 38% of respondents required clubs

that played friendly matches abroad to provide the names of match officials and the FIFA licensed match agent organising these games.

For visits from overseas clubs for friendly matches, 66% of NGBs required notice of these trips. The notice required ranged from 60 days (England) to the day before the game (Belgium). In 95% of cases, match officials for these games are provided by the home association.

Note:

Survey respondents: Austria, Belarus, Belgium, Croatia, Cyprus, Czech Republic, England, Georgia, Hungary, Italy, Latvia, Luxembourg, Malta, North Macedonia, Norway, Poland, Slovakia, Spain, Sweden, Switzerland, and Ukraine.

Contacted but no response received: Albania, Andorra, Armenia, Azerbaijan, Bosnia & Herzegovina, Bulgaria, Denmark, Estonia, Faroe Islands, Finland, France, Germany, Gibraltar, Greece, Iceland, Republic of Ireland, Israel, Kazakhstan, Kosovo, Liechtenstein, Lithuania, Moldova, Montenegro, Netherlands, Northern Ireland, Portugal, Romania, Russia, San Marino, Scotland, Serbia, Slovenia, Turkey, and Wales.



PLAYER SURVEYS

The project surveyed players to understand their experiences of match-fixing in friendlies and make comparisons with official league and cup matches.

The survey of 694 players from the top three divisions in Cyprus, Greece and Malta covered mainly players aged 18-30 years of age, with the largest proportion of the sample aged between 18-22 years. The largest proportion of players came from Cyprus (66%) followed by Greece and Malta.

Most of the respondents to the survey were playing in the second division, where clubs are financially more vulnerable and match-fixing more likely. Around 70% of respondents came from the country of their club of employment.

The research built on an earlier questionnaire carried out by FIFPRO in 2014, which was part of its “Don’t Fix It” campaign. This research defined games where respondents knew a match that they played in had been fixed or suspected was fixed and on approaches to manipulate matches.²⁵

Playing in a Game Players Knew or Suspected was Fixed

The survey drew on the difference between whether players knew a game to be fixed or suspected that the match had been manipulated. This showed that 26.5% of the respondents already suspected that a friendly game they participated in was manipulated, compared to 13.5% who said that they had played in a game they knew was fixed. Also, 16.5% of players had been approached to manipulate a friendly.

Players who played in a friendly they suspected was fixed

Greece	35.5%
Cyprus	25.3%
Malta	21.9%
Total	26.5%

Players who played in a friendly they knew was fixed

Greece	20.0%
Cyprus	14.0%
Malta	5.6%
Total	13.5%

Players who had been approached to fix a friendly

Greece	23.3%
Cyprus	16.4%
Malta	9.6%
Total	16.5%

The Approach and the Instigators

The research sought to identify where approaches were made to persuade players to manipulate friendlies and who the main instigators were. Out of the players having been approached, 40% were done so in the dressing room. In total, nearly half of all approaches (49.2%) were made on club premises of the dressing room, elsewhere in the stadium or the training ground. A further 6.1% of approaches were in hotels.

Who made the approach to fix a friendly?

Club officials	19.0%
Players	14.8%
Match Official	9.4%
Organiser/agent	8.3%
Someone else	12.0%
Don’t know	17.7%
Never confronted with the issue	18.9%

²⁵ Don’t Fix It – An education and prevention programme to fight match-fixing in football. Report May 2014.

A third of all approaches were made either by club officials (19%) or players (14.8%), while 9.4% of approaches were by match officials. The percentage of match officials trying to manipulate friendly matches was higher in Cyprus, where 11.4% of respondents responded that the referees or match officials were responsible compared to 8.7% in Greece and 2.1% in Malta.

Match agents seek to bypass national associations and approach regional associations directly, which creates an integrity vacuum that is exploited by match-fixers.²⁶ Match officials going on their own training camps overseas can be unwittingly lured into taking charge of games targeted for manipulation by fixers, but fixers also introduced officials into friendly matches solely for the purpose of fixing. An investigation by the European Investigative Collaborations network uncovered a group of eight former and current players posing as referees who took charge of 32 matches in training camps between 2016 and 2018 as part of a series of manipulations tied to a match-fixers. This same group was also linked to real match officials who travelled to Cyprus and Turkey and were involved in suspicious friendly fixtures.

Dubious officiating has been at the heart of numerous suspicious friendlies staged in a training camp environment in Europe. Players sometimes responded to this by walking off the field, or even missing unmerited penalties on purpose on a number of occasions in locations including Cyprus, Spain and Turkey.^{27 28}

The 2014 FIFPRO survey found that in Greece, club officials were the main instigators according to 48.8% of respondents and the survey results bear this out at a wider level. Here too, club officials are considered as the primary instigators of match fixing according to 25.5% of respondents. Given players' suspicions about the involvement of club officials in manipulation, respondents were not comfortable reporting approaches or concerns over fixed matches to national associations.

While younger players are often perceived as being more vulnerable to manipulating a game or being approached, this was not reflected in responses by players from Cyprus, Greece,

and Malta. The survey showed that 86.3% of respondents did not believe younger players were more vulnerable. As older players typically hold more influence and power in a dressing room and are likely to be approached, this may explain why younger players are not perceived as more vulnerable.

Almost 40% of players who had been approached, were approached in the dressing room. This further supports the involvement from club officials in approaches to manipulate a game, as only club officials are likely to have access to the dressing room. In total, half of the approaches to players were in club facilities, namely the dressing room, training ground or stadium.

Where were players approached to fix a game?

Dressing room	39.5%
Other	19.3%
Combination of places	9.6%
Hotel	6.1%
Training ground	5.3%
Own home	5.3%
Elsewhere in the stadium	4.4%
N/a	10.5%

The second largest place where players were approached is other. Anecdotally, players routinely report approaches via social media such as Facebook and encrypted messaging services such as What's App or Messenger, so this is assumed to be the case for this response.

In some cases, this may be connected to 'organised criminality', but more often is individuals connected to football clubs, such as owners or even sponsors, who have access to the dressing room, training ground and other non-public areas of the stadium.

²⁶ <https://theblacksea.eu/stories/football-leaks/cypriot-deception/>

²⁷ <https://www.dailyrecord.co.uk/sport/football/football-news/players-deliberately-miss-penalties-purpose-9736187>

²⁸ 'Oefendual tussen de verhuisdozen' Dagblad De Limburger 13/7/2017.

Officials also play a key role in manipulating friendly games, particularly when the players are not involved. Referees working for match fixers have reportedly earned between €3,000 and €5,000 for two weeks officiating in Turkey.²⁹ Outside of club officials and players, match officials represent the next largest area of concern according to the survey, followed by match agents, who are often involved with recruiting and appointing these game officials in the first place.

Who were the main instigators of an approach?

	Friendly	Official game
Club officials	19.0%	25.5%
Players	14.8%	19.2%
Match Official	9.4%	8.8%
Organiser/agent	8.3%	3.6%
Someone else	12.0%	11.9%
Don't know	17.7%	15.1%
Never confronted with the issue	18.9%	15.9% ³⁰

The survey also asked players who the main beneficiaries of fixing friendlies were and this was again club officials according to 26.3% of respondents, ahead of players on 15% and match agents or organisers on 11%.

The survey found that 22% of players did not know who the beneficiaries were. Given that organisers such as promoters and match agents are typically distanced from players during friendly matches, the percentage of match agents or organisers may be higher.

Who were the main beneficiaries of an approach?

	Friendly	Official game
Club officials	26.3%	27.2%
Players	15%	18.2%
Match Official	9.2%	9.3%
Organiser/agent	11%	7.8%
Someone else	16.6%	16.8%
Don't know	22%	20.7%

Perceptions over whether friendlies or official games are more vulnerable were less clear. Out of those having expressed an opinion, a third of respondents believed that friendlies were fixed more frequently.

Friendlies vs Official Games

The survey also researched players' experiences of official league and cup matches that they knew or suspected to have been manipulated to make a comparison with the results for friendly games. Across the three countries, 13.5% of respondents had played in a friendly game they knew to be fixed compared to 21.3%, who had played in official games.

The proportion of players in Greece who played a match that they knew was fixed was larger than an earlier survey conducted as part of FIFPRO's "Don't Fix It campaign" in 2014. In this survey, 13.7% of respondents said they had played in a game that has since been identified as fixed. This can be partly explained by a greater proportion of players in this survey coming from smaller clubs, where fixing is more likely to be a problem.

In the 2014 survey, the percentage of Greek players who had played in a league match that they believe was fixed was higher at 64%, compared to about 50% here.

²⁹ <https://www.gsp.ro/gsp-special/investigatie/investigatie-gsp-gazeta-a-discutat-cu-cel-mai-cunoscut-aranjor-de-meciuri-din-lume-singaporezul-wilson-raj-perumal-cu-romanii-e-usor-nu-au-integritate-cum-functioneaza-sistemul-din-antalya-si-cipru-500636.html>

³⁰ As multiple answers were possible, the totals do not add up to 100%.

Players playing in a game they knew was fixed

	Friendly	Official game
Greece	19.8%	18.2%
Cyprus	13.9%	20.6%
Malta	5.3%	27.2%
Total	13.5%	21.3%

In addition, 42.2% of respondents had played in an official game that they suspected was fixed compared to 26.5% that played in a friendly that they suspected was fixed. However, it should be noted that players typically play in three or even four times more official league and cup matches than friendly matches even when including games played in pre-season and mid-winter breaks.

Players are also approached significantly more often to manipulate official matches for sporting reasons such as league position or European qualification rather than solely for betting reasons.³¹ As there are no real sporting reasons to manipulate friendly matches, the amount of suspicious friendly games is higher as a proportion of total matches played.

Players playing in a game they suspected was fixed

	Friendly	Official game
Greece	35.5%	49.6%
Cyprus	25.3%	30.4%
Malta	21.9%	81.6%
Total	26.5%	42.2%

Players who had been approached to fix an official match

	Friendly	Official game
Greece	23.3%	45.5%
Cyprus	16.4%	11.2%
Malta	9.6%	23.9%
Total	16.5%	19.6%

Conclusion

This survey found that the fixing of friendlies is a domestic and international problem. Respondents typically play three or four times more official matches over the course of a season than friendly games. So, the proportion of friendly matches where players reported both approaches and suspicions that games were corrupted is in reality higher than official games on a pro rata basis.

The main conclusion of the survey is that the respondents believe there is indeed match-fixing in friendly matches and that approaches to players are primarily made in the dressing rooms, or a combination of elsewhere in the stadium, the training ground or the hotel.

The results support the findings that the main instigators and beneficiaries for match-fixing for both friendlies and official matches are club officials according to 19% and 25.5% of respondents confronted with the issue. These personnel typically have access to the main venue for making approaches to players. This was the key finding across all three countries.

³¹ <https://www.ugent.be/en/news-events/matchfixing>

ROLE OF FOOTBALL PLAYERS' UNIONS

Players unions play an essential role in combating all types of match manipulation and most importantly protecting their members. The survey of players from Cyprus, Greece, and Malta showed that players unions are the primary institution for players to report these concerns (84.5% of all respondents) ahead of the police (54.8%) and national associations (37.1%).³²

To try to deter match-fixing, international football players union FIFPRO launched the Don't Fix It project in 2012 in cooperation with Birkbeck University, the European Union and UEFA. FIFPRO did not believe in a zero-tolerance policy and a one-size-fits-all approach and wanted to enter the dressing room to find out why players become involved with match-fixing and to produce a programme to inform and protect players from the dangers of match manipulation. The goals of this educational and prevention programme are to:

- raise awareness
- reduce the conditions that lead to match-fixing
- establish strong and relevant networks at national and European levels.

FIFPRO and UEFA also developed a Code of Conduct in 2014 against match-fixing, which has been adopted by all stakeholders in European professional football.³³

Project partner P5 EU Athletes is also a recognized stakeholder in the European sport sector and adopted combating match fixing a key priority in 2016. Since the first EU Workplan for Sport, EU Athletes has been an observer to different EU Expert Groups on Good Governance, Match-Fixing and Integrity, to represent the voice of the European athletes at European institutions.

EU Athletes has worked with the three FIFPRO members on this project - P2 PASP in Cyprus, P6 PSAP in Greece and P7 MFPA in Malta - to develop educational awareness programmes that encourage players to understand and report match manipulation in friendly games.

The three FIFPRO members involved with this project have also all adopted the UEFA Code of Conduct and independently rolled out their own match fixing awareness programmes.

In Cyprus, this comprises:

- Training and education of player members
- Awareness of match-fixing
- Training Seminars about the manipulated games
- Research and Scientific studies
- Mental health programs and support of professional football players

PASP also offers legal assistance, advice and protection. In addition, it established a wide network of people in key positions that can provide help to players. PASP has also launched several campaigns against the manipulation of football matches using a variety of mediums from bracelets, shirts, and leaflets. Furthermore, it developed a Code of Conduct that sets out the guiding principles for all players on the issues surrounding the integrity of football.

In Greece, the aims of PSAP are to develop athletic spirit, fair competition, solidarity among colleagues and mutual aid between its members. PSAP aims to protect football from any danger obstructing its progress and improvement. PSAP's work includes studying the social, technical, economic, and professional problems of its members and to look for methods, ways and means for their resolution.

In Malta, the MFPA emphasises the following to its members about match-fixing:

- It is a criminal offence
- Refusing is the right thing to do
- The player risks huge sporting sanctions that will probably end their career
- Criminal charges may be brought against the player, with legal consequences if found guilty
- Participating will aid criminal organisations
- Participating will directly harm the sport that billions of people love

³² As multiple answers were possible, the totals do not add up to 100%.

³³ <https://www.uefa.com/insideuefa/stakeholders/news/0219-0f8a6924b415-ad5fc8fc44f6-1000--european-football-adopts-code-of-conduct-on-integrity/>

Apart from refusing to participate, players in Malta are also requested to report any match-fixing approach immediately. A failure to do so may result in heavy sporting sanctions. Whilst MFPA is wholeheartedly against match-fixing, it also understands that reporting an approach may not be as straightforward as some people may think. Fear of reprisals for refusing to comply with match fixers is a reality amongst players. Some players would rather face sporting sanctions than create other consequences for themselves and their families.

The case of Samir Arab is an example of this. UEFA investigated two European Championship Under-21 qualifying matches that took place in March 2016. These games were not manipulated because several Maltese players who were approached - including Arab - refused to take part in match-fixing. Arab only reported the approach three weeks after the incidents occurred, but cooperated fully with a police investigation, gave evidence in court against the match-fixer and was described by a Maltese court as a “very important witness.”³⁴

The police investigation and Arab’s testimony preceded UEFA’s disciplinary charges by approximately one year, but in 2018 UEFA subsequently decided to ban Arab for two years for not immediately reporting the incident. This ban was subsequently upheld by the Court of Arbitration for Sport.³⁵

As a consequence of this incident, MFPA set about trying to help players do the right thing for themselves and their sport. Research as well as consultation with players and stakeholders led MFPA to the conclusion that an anonymous reporting mechanism would go

a long way to alleviating these fears.

There are many reporting options developed for players. FIFA has confidential methods for players to report match-fixing approaches through its FIFA Integrity App and another integrity app, BKMS. FIFPRO’s smartphone Red Button app, was also developed in 2016 to encourage players to report concerns and rated the most effective in use in 2018 according to an independent report.³⁶

In September 2020, FIFPRO and FIFA signed a collaboration agreement to encourage players to use the Red Button app.³⁷ In 2020, the MFPA introduced the Red Button app to Malta and this was personally endorsed by Samir Arab.³⁸ Licensing expenses are completely covered by FIFPRO and MFPA members can request a unique code, which allows them to access the web-app. Codes are randomly assigned, and there is no way to link a code to the player. Via this web-app the player can submit an anonymous report which is completely untraceable.

The MFPA believes that with the co-operation of players, the Red Button can be a crucial tool in the fight against match fixing. The Red Button app was introduced into Cyprus on February 5 2020 and within weeks the local union had received 20 reports that led to two arrests for match-fixing.³⁹ Over the course of the 2019/20 season, the Cypriot players union PASP reported 35 reports via the Red Button.

Reporting anonymously is the preferred route for 67.7% of players surveyed in Cyprus, Greece and Malta for this project and 69.1% of respondents would do so using FIFPRO’s Red Button.

³⁴ <https://www.independent.com.mt/articles/2018-08-22/football/Court-of-Arbitration-for-Sport-upholds-two-year-ban-for-Maltese-football-player-Samir-Arab-6736195223>

³⁵ <https://www.uefa.com/insideuefa/about-uefa/news/0248-0f8e62b299fc-bebe1ae66c15-1000--uefa-welcomes-cas-decision-to-dismiss-appeal-by-maltese-player-/referrer=%2Finsideuefa%2Fnews%2Fnewsid%3D2567612>

³⁶ ‘Which whistle-blowing system for the French national platform to fight against the manipulation of sports competitions?’ Kalb, Christian. (October 2018).

³⁷ <https://www.fifa.com/who-we-are/news/fifpro-fifa-sign-collaboration-agreement-to-reinforce-fight-against-match-fixing>

³⁸ <https://www.youtube.com/watch?v=p7V7-Z3yykA>

³⁹ <https://cyprus-mail.com/2020/02/13/red-button-app-effective-while-protecting-players-anonymity-says-pasp-president/>

SUSPICIOUS FRIENDLY MATCHES

Instances of suspected manipulation in club friendlies began to emerge publicly in the first decade of the new Millennium as the training camp industry, which had initially developed in more traditional destinations such as Portugal and Spain to cater for pre-season preparations for visiting clubs, began to expand. Euro 2008, which was jointly staged by Austria and Switzerland, provided the catalyst for a growth in training camps in the former, while other destinations offering lower budget camps began to grow in popularity in places including Cyprus, Slovenia, and Turkey.

As more matches were played in these camps, betting operators began to offer more of these games to customers and there was an increase in the number of matches attracting suspicion amongst betting operators and monitoring companies for suspicious betting.

Between 2012 and the end of 2015, more than 60 friendly matches in Europe were identified as “suspicious” just in open-source media alone. The majority of these games were staged in Turkey, Spain and Cyprus and played during the summer or midwinter breaks.

The dataset for these games covers the period 2016 to 2020 inclusive and was compiled by the main author of the report from a wide range of sources, including open source media, players and national player associations, bookmakers, betting monitoring companies and national associations. Further details on how this dataset was gathered is available on P42-43.

Games were rated as suspicious by the organisers of this project based on criteria set by betting monitoring companies or betting operators, open-source details in publicly available media investigations that indicated some form of manipulation was possible or on the testimony of players. It is important to note that these friendly matches should be categorised as “suspicious fixtures” and NOT as confirmed fixed games.

Overall, in the five years between 2016 and 2020, there was a total of 257 friendly games staged in Europe that can be categorised as “suspicious fixtures” in terms of match manipulation. These are games where a rating for suspicion is at a

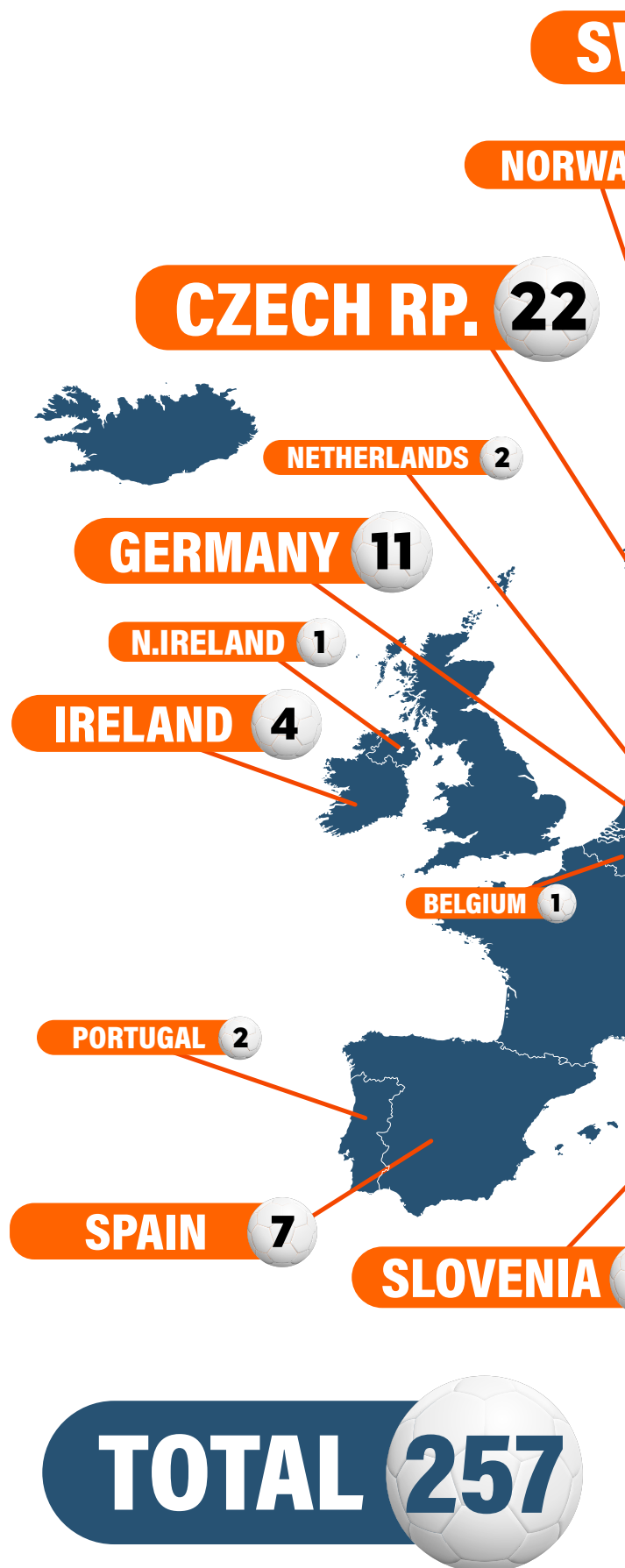




Figure 2. Suspicious friendlies by country

medium level or above, or where media stories suggest clear reasons for suspicion or, in the case of games based on player testimony, where the players reported to their unions playing in a match including irregular activity from fellow players, match officials or club officials. (For more information, see note at the end of the chapter. The full five-year breakdown of this data is available in appendix 3).

The country staging the largest number of suspicious friendlies between 2016 and 2020 was Cyprus with 44 games – or 17% of the dataset. The next largest was Ukraine with 38 matches, although this was primarily due to a large number of fixtures in 2018 (22 games), the single largest number of suspicious friendlies in one year in any one country.

Ukraine had a long-standing problem that included manipulation of friendlies with one training camp friendly match between Chornomorets Odessa and Olimpik Donetsk in 2015 attracting bets of \$200,000.⁴⁰ However, after 2018, action by the Ukrainian Association of Football (UAF) to tackle match manipulation including raids on 35 clubs, led to a drastic reduction in the number of competitive and friendly matches where manipulation was suspected.⁴¹

In the Czech Republic, an existing problem with manipulation of matches between domestic clubs escalated as fixers took advantage of the void in competitive games created by the COVID-19 pandemic. In December 2020, action by local judicial authorities led to the arrests of 19 people including the deputy head of the Football Association of the Czech Football Republic.⁴² This explains some of the suspicious matches recorded in 2020, but not all.

Prior to 2016, Turkey staged a significant number of suspicious games between clubs from other countries. The country ranks fourth in terms of hosting suspicious friendlies for the 2016-2020 period. No suspicious games were identified in 2019 before irregular matches returned again in 2020, although this time not involving clubs from outside Turkey.

In 2019, there was a crackdown by law enforcement on match fixing in a number of sports across Europe. The number of suspicious friendlies in Europe subsided overall and no suspicious friendlies were identified in Sweden, for example. However, by the following year there was a number of suspicious matches

including professional Swedish clubs, and attempts to influence amateur teams after the onset of COVID-19.

The number of suspicious friendlies staged in Russia increased between 2019 and 2020 as fixers again appeared to take advantage of the lack of competition games that was caused by the onset of COVID-19 (see case study).

Neutral Venue Games

The dataset shows that 24% of the suspicious matches over the five years of the study were played in a different country of either of the competing clubs. This percentage could have been higher without the impact of COVID-19, in 2020, which reduced travelling by many clubs with just four games in neutral venues rated as suspicious.

The largest number of matches played in neutral venues during one calendar year was 2016 (21 games), when 58% of all suspicious friendlies were staged in a different country to either of the competing clubs. (The full five-year breakdown of this data is available in appendix 4).

Fig 3. Suspicious friendlies played in neutral venues

Country	TOTAL
Cyprus	23
Turkey	13
Spain	5
Netherlands	5
Bulgaria	4
Croatia	4
Austria	4
Slovenia	2
Slovenia	1
Poland	1
TOTAL	62

⁴⁰ <https://www.sportsintegrityinitiative.com/match-fixing-in-the-ukraine-the-grim-reality>

⁴¹ <https://www.bbc.co.uk/sport/football/44216041>

⁴² <https://www.praguemorning.cz/czech-police-charge-20-in-soccer-corruption-probe>

Cyprus staged the most suspicious neutral venue friendlies, primarily due to games between 2016 and 2018. Turkey hosted the next largest amount. Combined with Cyprus, these two countries hosted 61% of all suspicious friendlies staged in a neutral venue over the five years of the dataset. Turkey was also the host for suspicious matches involving clubs from other countries at the start of 2021, including one between the Ukrainian Premier Liga side FC Mariupol and Polish side Ekstraklasa side Raków Częstochowa, which is the subject of a formal complaint to UEFA by the Ukrainian Association Football (UAF).

Clubs

A total of 338 clubs from 42 different countries, mainly in Europe but also including a small number of clubs from Asia and the Middle East, were involved in suspicious friendly matches played in Europe between 2016 and 2020. When the same clubs are repeatedly playing in friendly matches that attract suspicion this would suggest that at some level, whether it be players or staff, there is some link with the club and possible manipulation. A total of 92 clubs were involved in two or more suspicious matches, 35 clubs were involved in three or more and 11 clubs played in five or more suspicious friendlies.

The country with the largest number of clubs involved in suspicious friendlies is Ukraine, where one club, PFK Sumy, was involved in 10 games. Competitive fixtures played by this club also came under scrutiny. In 2020, Sumy had its professional status removed by the UAF.⁴³ Five of the 12 clubs involved with the most suspicious friendlies were from Cyprus, where two clubs were involved in nine and eight suspicious matches respectively over the five years of the survey. Two Czech clubs were also involved in seven and six matches respectively.

The majority of the clubs involved in suspicious matches do not play in their national top division. This reflects a wider shift by manipulators to take advantage of clubs playing at a lower level that are more prone to being financially weak and less likely to be monitored.⁴⁴ This also reflects an increase in data being collated on these friendly games by data providers and, in turn, being sold to and offered by betting operators around the world operating under varying degrees of regulation,

where inside information about team line-ups or tactics can also be a cause of irregular betting rather than match fixing itself.

It is important to note that match officials play an important role in the manipulation of matches and clubs or players have frequently been unwittingly caught up in suspicious friendly fixtures. Even where clubs are behind fixing, this does not mean that their opponents are also involved in this manipulation or even aware. A large number of clubs in one country can also be indicative of a small number of local teams attempting to manipulate games against a range of entirely innocent opponents. The same applies to a club, where a small number of players may be attempting to manipulate games and their actions would not be indicative of the whole team.

Match day and time

On 34 occasions between 2016 and 2020, two or more suspicious friendlies were staged on the same day. These games were mostly staged outside of traditional matchdays. On five separate Tuesdays and nine different Wednesdays, two or more suspicious friendlies were staged. On Tuesday in July 2018, four friendlies involving clubs from just three different countries all attracted suspicion.

Given the transnational nature of sporting manipulation and friendlies in particular and the role of criminal syndicates, this may indicate attempts to deflect attention from individual fixtures by manipulating more than one game on the same day.

Friendly matches are more likely to attract greater liquidity - the amount of money that is bet on a game - on betting markets if they are staged on a different day and time to regular league matches as there are fewer official matches being offered to bettors as competition. Betting on friendly matches typically involves smaller amounts and can be spread across multiple bets using the agent system in Asia, which involves bets being placed then moved anonymously up a pyramid structure that allows for anonymity amongst bettors and is often funnelled through poorly or unregulated operators based in Asia. This suits match-fixers looking to disguise their identity (see diagram). As a result, relatively small value bets on obscure fixtures are less

⁴³ <https://uaf.ua/article/39208>

⁴⁴ Situation report: The involvement of organised crime groups in sports corruption. *Europol* (2020), p16.

likely to be detected and even if they are, the lack of regulatory betting oversight and integrity provisions means that there is little, if any, mechanism for many Asian operators to formally report and address such activity through sports' governing, regulatory and law enforcement channels.

Matches staged on different days of the week to league fixtures - particularly high profile European leagues – or matches in UEFA club competitions can be more indicative of manipulation. By staging a game when there is less competition from more high profile matches, bettors have less choice and are more likely to bet on these games. This increases the liquidity and means that any attempted manipulation is less likely to attract attention, particularly as organised crime groups (OCGs) tend to bet with operators in the Asian market due to the pyramid agent system with bets placed at one level then passed up the pyramid. This makes identifying bettors more difficult than in Europe, where regulated operators are required to know the identity of their customers and to monitor and report suspicious betting activity to the relevant authorities.

The greatest proportion of suspicious friendly matches are staged during January and

February, which is the mid-winter break for many European leagues and when many clubs go abroad for training camps.

January and February is also the start of the pre-season period for those leagues that run from March to Autumn, so clubs in those leagues are involved in preparatory matches. The research also showed that 10% of suspicious friendlies were played in March, which typically features a FIFA agreed international break. Some clubs choose to play friendly matches in this period without their international players.

The third largest percentage of suspicious friendlies were played in July, when clubs that play in leagues staged from August to May are engaged in preseason training and many clubs also go abroad on training camps.

Over the course of the study, the greatest proportion of suspicious matches were staged on Wednesdays followed by Fridays. Matches played at a different time to league matches, particularly in the European morning, which is the late afternoon in South East Asia and a prime time for betting in the region, will also attract greater attention on betting markets in Asia. Central European time is between seven and eight hours behind Asian betting hubs, such as Hong Kong.



Source: Asian Racing Federation

⁴⁵ Europol, p14.

Month	% Total	Weekday	% Total
January	20	Monday	10
February	25	Tuesday	16
March	10	Wednesday	21
April	2	Thursday	12
May	4	Friday	18
June	6	Saturday	14
July	15	Sunday	11
August	8		
September	6	European Time	%
October	3	Morning	17
November	2	Afternoon	57
December	0	Late afternoon	20
		Evening	6

Figure 4. Month, day and time of suspicious friendlies

The study shows that 58% of all suspicious friendlies over the period kicked off during the early afternoon, which would be expected. However, 17% of suspect matches kicked off before noon in the country of origin.

While staging matches at irregular times of day is not uncommon within training camps to avoid hotter temperatures in countries with warmer climate, staging games at 9:00am is less common. This probably reflects the will to attract more interest in Asian markets as there are few if any competitive European games underway at that time.

The largest proportion of suspicious fixtures were played in the European midwinter, when many European leagues take a break and clubs attend training camps. Games played in January and February comprised 45% of all suspicious matches, while 15% of games were staged during July.

Overall, the number of suspicious friendlies identified in this dataset illustrates the potential

scale of a problem that touches – although not necessarily directly involves – clubs from 32 members of UEFA and also clubs from further afield, including a small number from Asia and the Middle East playing European opposition in Europe during training camps.

Case Study - The COVID-19 Effect

As the COVID-19 outbreak spread across Europe, league and cup matches were suspended and at one point the only leagues still playing regularly were in Belarus, Burundi, Nicaragua and Tajikistan. With little competitive football on offer, betting companies sought out other events to offer bets on. Well-regulated operators sought more reputable events to offer to customers, but some poorly-regulated or unregulated Asian-facing operators offered whatever was available, which ranged from soap ball to Ukrainian table tennis to – at one Asian operator - betting on the number of deaths from the actual virus.

During this period, the lack of regulation over club football friendlies was exploited by criminals across the world with suspicious friendlies played in countries from Russia and the Ukraine to Brazil and Vietnam. This ranged from individual clubs arranging games, with one Eastern European team involved in six suspicious friendlies from the spring of 2020 to a tournament in the Ukraine, the Azov Cup, being created and players playing in the strips of real clubs in fixtures that were covered by data companies and subsequently sold to and offered by Asian bookmakers. Four of these ‘fake’ games were played before the scam was uncovered by the Ukrainian Association of Football and the games stopped.⁴⁶ This scam was arranged to try and defraud bookmakers who would utilise the match data being sold to offer betting unaware that the games and scores had already been decided by the organisers. Lack of regulation around the staging of friendlies helped this happen.

In Russia, a swathe of friendlies were played in March 2020 by amateur clubs from such a low level that their games would not normally be offered by many licensed or even unlicensed betting companies. Small provincial clubs in Russia have previously been linked to the Russian mafia.⁴⁷ And like the fake games in the Ukraine, these low-level Russian matches were on betting markets due to the dearth of alternative fixtures and because live data was available from these matches.

These games were pushed on social media via various fan sites, including some tied to Russian ultras, and picked up first by domestic online bookmakers, such as Bet600, and then by larger companies outside Russia and even Europe, even though there was very little information available on some of the actual fixtures, which may well have been ghost games.⁴⁸

Some bettors claimed online that games being traded as live had actually already been completed, culminating in leading licenced bookmakers and Asian operators having to void bets on a game between Zenit Moscow and Kraskovo Moskovskaya Oblast on March 27 as this fixture did not involve the real clubs.

In a statement, Kraskovo said: “The website of one of the bookmakers is currently broadcasting the ‘match’ that our team is allegedly playing now. In fact, this is a fake. Not a single player of the FC Kraskovo team is currently participating in any game. Why bookmakers decided to use the name of our team for their own purposes remains a mystery.”⁴⁹ This is not strictly true and the real reasons are a combination of commercial pressures and failures in verification procedures at data providers and the betting operators they sold this ‘fake’ match data to. After this game was voided, the spate of suspicious Russian friendlies subsided.

Notes on dataset

Matches included in this dataset were based on risk indicators provided by the sources of the information. More than 60 matches initially flagged up by data providers and bookmakers as suspicious were subsequently excluded from the dataset as irregular betting patterns could be explained by mispriced starting odds, often due to team news only becoming known after kick-off. When odds were changed to reflect the players on the field, this subsequently prompted a movement in odds on betting markets which, while atypical, was not due to suspicious activity. Friendly matches offered for betting frequently exclude key information, such as the venue of the fixture, and some matches have also been excluded from the dataset because sufficient information on the actual staging of the match was not available. Again, this does not mean that these matches should not be considered suspicious, but that there is not the same level of indicators as those games included in the dataset.

Major well-regulated betting companies all have in-house protocols and trained personnel, which will advise on markets to avoid. As such, a lack of alerts from a particular country may not be due to lack of suspicious activity, but instead a dearth of betting markets being offered on what are considered high risk markets or limits on potentially suspect games, which would restrict liquidity and deter potential manipulation.

⁴⁶ <http://www.insideworldfootball.com/2020/03/31/ukraine-ghost-games-fool-bookies-punters-data-firm-criminals-pull-off-perfect-crime>

⁴⁷ *Sports betting and corruption: how to preserve the integrity of the sport (2012)*. IRIS, University of Salford, Cabinet PRAXES-Avocats, CCLS, p30.

⁴⁸ Games that could not be substantiated as actually having been played are not included in the dataset.

⁴⁹ Translated from <https://www.championat.com/bets/news-4005547-bukmekery-prinimali-stavki-na-nesuschestvujuschij-futbolnyj-match-v-rossii.html>

Information in this dataset comes from a variety of sources, including open source media, player associations, bookmakers, betting monitoring companies and national associations and some sources cannot be identified, particularly individual players involved in games. The main sources for this dataset were:

- International Betting Integrity Association (IBIA) is a project partner and not-for-profit association whose members include many of the world's largest regulated betting operators and which operates the largest customer account-based integrity monitoring system in the world and covering \$137bn in bets per annum.
- STATS Perform is a leading sports data company, whose approach to managing match-fixing risk that includes betting market monitoring, global intelligence gathering, and performance analysis as a combined service. With Starlizard, STATS Perform is the co-author of the annual Suspicious Betting Trends in Global Football Report.
- Starlizard Integrity Services is part of the Starlizard sports betting consultancy and offers Betting market analysis and opinions on Asian Handicap and Total Goals markets, full-time and half-time markets, pre-match and in-play, with a view to identifying or discounting integrity concerns.
- Bet Genius a leading sports data company, which provides market monitoring and performance analysis to clients around the world from the English Premier League to Mexico's Liga MX.
- Federbet was an international non-profit federation that works on behalf of betting companies to combat match-fixing and which has presented to the European Parliament on the dangers of sporting manipulation.⁵⁰ Federbet has been superseded by the Sports Integrity Team.
- Pinnacle is an online sports betting company licensed in Curacao.
- The Ukrainian Association of Football (UAF) is responsible for the organisation and governance of football in The Ukraine.
- The Slovak Football Association is responsible for the organisation and governance of football in Slovakia.
- The Pancyprian Footballers Association represents footballers playing in Cyprus and is both a project partner and member of FIFPRO.
- Asianmonitor is a professional odds monitoring and risk management tool for bookmakers and sports organizations.
- Francesco Baranca is the head of the ethics and fair play committee at the UAF. He was previously head of a legal department for some of the biggest betting companies in Europe and general secretary of Federbet and has been an expert witness in a number of match-fixing cases.
- Chris Kronow Rasmussen is an expert in monitoring match fixing on betting markets. Formerly an employee at the World Lottery Association and Danske Spil, he lectures at New Haven University in the USA on match fixing.

⁵⁰ <https://www.theparliamentmagazine.eu/news/article/federbet-match-fixing-in-europe-has-reached-epidemic-proportions>

TRAINING CAMPS AND FRIENDLY TOURNAMENTS

Clubs going overseas for training camps in pre-season and during mid-winter breaks is a long-established and perfectly legitimate practice within the football industry. However, evidence suggests that training camps are unregulated at international level and only sporadically so at domestic level. There is also no regulation of the tour operators that organise these training camps other than for the compulsory involvement of a match agent, whose has been licensed by FIFA and should oversee the match.

Only individuals can apply for licences – not companies – even though most training camps are run by private companies. The agent must also enclose confirmation from their national association that they are of a “good reputation” and that the association has no objection to their organising matches. It is the responsibility of the national association in question to examine the application.⁵¹

Once this has been provided, the application is submitted to the FIFA Player’s Status Committee for consideration. FIFA will only issue licences to match agents, which have professional liability insurance with a minimum cover of 200,000 Swiss francs to cover any claims from parties involved with that agent. Any agents who are unable to secure this insurance must lodge a 100,000 Swiss Francs as a bank guarantee with FIFA.⁵²

Ensuring the requirement to involve a licensed match agent is met is generally left to clubs in many countries and is, in reality, rarely policed. One very experienced UK match agent testified to this project that they only had their FIFA affiliation checked once in 20 years.

Understanding exactly how many friendly matches are played within the environment of training camps is difficult due to lack of regulation in so many territories across Europe. However, in the busy period of January and February and the summer months, thousands of games are played. The main centres in the summer are Austria, Spain and Portugal, and Turkey in the midwinter break of January and February.

Austria

Good facilities and weather in the European summer make Austria popular with many clubs from across Europe. Before the outbreak of coronavirus, in excess of 250 category A games involving the adult senior side of professional or semi-professional clubs were being staged every summer in Austria. The latter country has one of the largest football training camp markets in Europe and the best regulated. Austria was the most popular preseason destination for clubs in the German Bundesliga and Italy’s Serie A between 2013/14 and 2017/18.⁵³ Between 2008/09 and 2019/20, Austria was also the third most popular destination for English Premier League (EPL) clubs in preseason behind the USA and Germany.

Figure 5. Friendlies played in Austria

Category A club friendlies	
Year	Friendlies
2016	274
2017	294
2018	287
2019	245
2020	91

Source: ÖfB

All clubs proposing to play in Austria must register with the Österreichischer Fußball-Bund, which will assess fixtures and deny permission for any friendlies where crowd disturbance between rival supporters may manifest itself. A fee of around €150 is levied per game. This can be higher if the application is made through a regional association.

The ÖfB also works with police where any suspicion of potential match manipulation is suspected. For example, in July 2016, the Salzburg police raided the hotel of Teuta Durrës on suspicion that the Albanian club had fixed two friendly matches recently played in

⁵¹ FIFA Match Agents Regulations. Article 5.

⁵² FIFA Match Agents Regulations. Article 7.

⁵³ A Friendly Business: A Critical Evaluation of the Globalisation of the Preseason Friendly. Menary Steve (CIES 2019).

Austria.⁵⁴ The same year, Austrian police raided a hotel occupied by Romanian club Academica Clinceni, who were on a training camp in the country and suspected of involvement in match manipulation.⁵⁵

"It's about compliance. We are interested in stopping match fixing so we need to know the details but a lot of teams in camps do not know what other teams in camps are doing. From a compliance point of view 60 days is fine but from a practical level it's impossible. The minimum is 21 days. We need that to set up security and to contact the Ministry of the Interior and they will decide if each friendly can go ahead. We might object to 20 games. It's not about stopping the game but about finding a different time slot or location."

ÖfB secretary Thomas Hollerer.⁵⁶

Operation of this system in Austria is partly-funded through the ÖfB levying registration fees on match agents and clubs, in return for supplying officials. Clubs are categorised based on the league level in their home country and the size of the fees reflect this, starting at roughly €200 for smaller clubs and rising to €5,000 for the few games each summer that involve transnational clubs from major European leagues. For these games, the ÖfB also supplies a fourth official but there are no rules on data rights. Some clubs will eject the data scouts that supply information to make live betting possible if they are identified. ÖfB rules on friendlies are available in appendix 5.

Spain and Portugal

Spain and Portugal are also long-standing destinations for many clubs in Europe. Large numbers of games have been played each summer in both countries for decades. One leading Spanish training camp operator, Football Impact, organises more than 260 matches every year for more than 230 clubs from 40 different countries.⁵⁷

The project team established that the permission of the Royal Spanish Football Federation (RFEF) is needed before any friendly can be played in Spain, and once that permission is granted, the RFEF (through the Referee's Technical

Committee) appoints the officials for the game from the Officials Register.⁵⁸

According to the RFEF, the organisers of the match have to pay between €150 and €300 for the services of the official to their committee, which appoints the officials and makes the necessary payments. Previously, the organisers used to give money direct to officials. However, this is now deemed inappropriate. The RFEF says it never gives permission for foreign match officials to officiate a friendly in Spain.

When a Spanish team wants to play a friendly abroad, they again need permission, but the RFEF requires the officials to be appointed by the governing body in the country the match is being played. The RFEF also requires registration from visiting foreign teams.

However, the RFEF accept that in some cases when two teams from overseas play a friendly in Spain this can be played without notification. This is especially likely to be the case if an independent agent or promoter from another country is involved.

If a friendly match played in Spain is suspected of any sort of manipulation, then the RFEF will either investigate it themselves or more likely refer the matter to the Police.

The regulation of friendlies in Portugal is very similar to Spain in that teams are required to get the permission of the Federação Portuguesa de Futebol (FPF)⁵⁹ in advance. However, the processes for the appointment (and payment) of officials for friendly matches is less strict. There is also an anomaly in the match-fixing legislation in Portugal in that the current legislation only relates to matches played within competitions and not friendlies.

When there is an allegation of match-fixing in a friendly, this omission inhibits/prevents any form of meaningful investigation by law-enforcement and is de facto a reduction in the deterrent to potential fixers. This situation is compounded by the fact that the FPF has very limited in-house capacity to investigate allegations of match-fixing in friendly matches.

A 2015 report by the International Centre for Sports Security (ICSS) cited 15 suspicious matches arranged by one leading Spanish training camp operator, which put on matches

⁵⁴ <https://www.sn.at/sport/fussball/verdacht-auf-spielmanipulation-bei-testspielen-in-oesterreich-1278586>

⁵⁵ <https://theblacksea.eu/stories/football-leaks-2018/eric-mao-asset-stripper-european-football/>

⁵⁶ Interview 18/2/2019

⁵⁷ <http://www.footballimpact.com>

⁵⁸ Alfredo Lorenzo Mena - Director de Integridad y Seguridad, Integrity and Security Officer - FPF - August 2019

⁵⁹ Rute Soares - Coordenadora, Integridade e Compliance | Integrity and Compliance - RFEF - August 2019

from clubs in Europe and Africa and had organised 575 matches in the previous four years at just one venue in southern Spain.⁶⁰

On January 1 2015, Belgian club Standard Liège played SC Heerenveen in Marbella and the Dutch club's goalkeeper walked off the field after a series of dubious penalty decisions leading to the game being abandoned.⁶¹ While Dutch authorities did investigate this incident, no action was taken by UEFA and FIFA and the referee in this game was still officiating in Spanish regional games prior to the outbreak of the pandemic in 2020. The organisers remain one of the largest training camp operators in Spain but matches staged in their training camps have again fallen under suspicion, including a series of matches played by Latvian club Ventspils in February 2019 (see intelligence report, appendix 6).

A key weakness in the organisation of these games in Portugal and Spain is the recruitment of match officials, which does not always follow the protocols of the two governing bodies. Match agents are officially required by FIFA to register friendly matches with national associations and in Spain agents who register with the RFEF claim that some assigned officials that usually take control of higher league games can cost in the region of €3,000 per game.

Interviews for this project found that match agents tend to operate either for a flat fee or on a percentage of the cost, both payable by the club. Training camp fixtures between low-profile clubs from smaller leagues or lower league teams from bigger leagues in neutral countries do not create sufficient revenue stream for match agents to justify spending this amount on officials. As a result, match operators, particularly in Spain, approach regional refereeing associations to recruit officials, who can cost as little as €150.

The games identified as suspicious in the 2015 ICSS report were officiated by match officials from the Andalucía Refereeing Committee. The RFEF admits that clubs can easily visit Spain without their knowledge if match operators choose to recruit match officials locally and that, while some clubs may not realise they need to register, others choose not to do so to avoid fees or to so they can play a friendly without detection from the authorities.

Case Study –The Atlantic Cup, Portugal

The Atlantic Cup is an annual friendlies tournament held mid-season in Algarve, Portugal that has taken place every year since 2011. The 2021 event was cancelled because of the COVID-19 pandemic but the tournament aims to resume in 2022.⁶²

The event is organised by Sporting Events, which is owned by two former professional footballers, Stefan Schwartz and Brian Horne. European football clubs from national leagues that have a break in the winter months are invited to play in the Atlantic Cup, which provides high quality preparation prior to their domestic season resuming.

The competition is televised, which allows fans across Europe to watch the games and provides media exposure for the clubs and individual players. As the Atlantic Cup takes place at a time when there is a dearth of other club-level league football, betting operators across Europe are likely to offer a variety of betting markets on all of the televised matches.

However, the tournament organisers say they are very much mindful of the challenges this brings and take steps to protect the integrity of the tournament from any form of betting-related corruption. Permission is sought from the FPF and insurance obtained, while only high profile European clubs that are financially stable and have the permission of their respective FAs to attend are invited. The FPF also appoint all officials for the matches and payment is secured through levy from the tournament organisers.

As an example of their commitment to integrity, in the past, the tournament organisers say they have been proactive in refusing entry to specific clubs who they suspected had nefarious reasons for wanting to play at the tournament.⁶³ One club asked to play but would only take part if they could play on the main pitch, which would have guaranteed their matches would have been televised. The organisers suspected this was because this club planned to manipulate matches and the invite was withdrawn. Years later, this club was censured by UEFA for match-fixing.

⁶⁰ ICSS Investigation Report – Malaga Suspected Fixed Club Friendlies 2014

⁶¹ https://www.youtube.com/watch?v=xrLn6r_w-V0

⁶² <http://www.theatlanticcup.com>

⁶³ Interview, Brian Horne, 23/9/2020

These integrity steps for the Atlantic Cup are a model on how to run a friendlies tournament/training camp that can provide an attractive (and fairly reliable) betting product for betting operators.

Turkey

Lower cost of accommodation, meals and facilities make Turkey an affordable destination for clubs with lower budgets. This country is popular in the midwinter break and even amateur clubs are taking midwinter breaks to this region.⁶⁴ Due to Turkey's geographical location, clubs from Asia and the Middle East are also regular visitors and play teams from UEFA in a market that is potentially the largest in Europe. One major Turkish tour operator claims to have organised more than 6,500 matches for 1,540 teams since the turn of the Millennium.⁶⁵

However, Turkey also lacks effective regulation to govern their sizeable friendlies market. The matches between Latvia and Bolivia and between Estonia and Bulgaria in February 2011 organised to defraud betting operators were staged in Antalya. The furore over these

matches meant that no further suspicious international matches were staged in Turkey, but 14 friendlies incidences of suspicious club friendlies were identified in open source media between the start of 2012 and March 2013. Data company Perform (now STATS Perform) cancelled live coverage of friendly games in Turkey in 2017 due to integrity concerns.⁶⁶

A snapshot of summer and winter training camps in the 2019/20 season for top division clubs in the Czech Republic, Romania, Slovenia and the Ukraine illustrates the scope of training camp activity and the focus on Turkey. While Austria is the most popular summer destination, mainly for better-financed clubs in these four leagues, Turkey dominates in winter training camps. All top division clubs from these four countries go abroad in winter and the entire Ukrainian Premier League visited Turkey in 2019/20.

This does not suggest that any of these camps have been manipulated, but to illustrate the extent of training camp activity by European clubs and the amount of interaction with clubs

Figure 6. Clubs going abroad

Summer					
Country	Clubs	Clubs abroad	Top destination	Countries	Non-UEFA
Czech Rep	16	14	Austria (10 clubs)	15	0
Romania	14	13	Austria (5 clubs)	15	0
Slovenia	10	8	Croatia (4 clubs)	13	1
The Ukraine	12	8	Austria, Turkey (2 clubs)	21	0

Summer					
Country	Clubs	Clubs abroad	Top destination	Countries	Non-UEFA
Czech Rep	16	16	Turkey (6 clubs)	21	1
Romania	14	14	Turkey (9 clubs)	21	3
Slovenia	10	10	Croatia/Turkey (4 clubs)	14	0
The Ukraine	12	12	Turkey (12 clubs)	25	3

⁶⁴ <http://925.nl> Get Rich with Dutch Amateurs Feel Like a Pro 6/1/2016

⁶⁵ <http://www.endatour.com>

⁶⁶ Interview with Jake Marsh, STATS Perform global head of integrity, 3/5/2019

from Europe and further afield, particularly in the winter break. In the 2019/20 midwinter break, clubs from the Czech Republic, Romania, Slovenia and Ukraine played teams from Algeria, China, Japan, South Korea, China and Uzbekistan. While the Turkish Football Federation is understood to have a process for registering friendly matches, details remain unclear.⁶⁷

Training camp manipulation

Interviews conducted for this project recorded numerous anecdotal examples of clubs across all levels in Europe being offered reduced or even free training camps in other countries. Clubs are routinely warned off taking up these offers by national associations. However, the latter have no power to intervene. In 2016, the integrity officer at the Maltese Football Association warned:

"It has become a pre-season routine for a couple of clubs to seek our advice before embarking on a new joint venture with foreign sponsors or investors. These groups or individuals make an appearance before the start of every new season offering quick fix solutions to unwitting club officials."

*The perplexing proposals enticing clubs to sustainability are at times, tabled in front of us in minimised form. We do our utmost to understand what really drives the interest in the project at hand. Our regulations do not empower us to condone or condemn any club from entering into a collaboration or business agreement."*⁶⁸

Similar conversations with clubs are reported by many other national associations, particularly in Eastern Europe, such as the Czech Republic and Slovakia. In 2016, a match agent offered Czech club Nitra free accommodation for 26 players and club officials for a 10 night stay in Cyprus.⁶⁹ The Slovak Football Federation warned Nitra not to accept this offer, but the club went regardless and were then involved in two suspicious friendly matches against Polish clubs.

As many clubs are unlikely to generate a commercial return for organisers and match agents through sponsorship or the sale of broadcast rights, the motivation for these deals and discounts by camp operators or external companies remains hard to comprehend. The existence of many instances of alleged and known manipulation within training camps reinforce the concerns.

One of the first examples of an external company offering to cover the costs of a training camp in return for manipulating matches was identified in 2009, when Bosnian club NK Travnik travelled to Switzerland for a training camp with the €80,000 cost borne by match fixers according to a 2009 German police investigation into the manipulation. NK Travnik played six matches in Switzerland and succeeded in manipulating three solely to earn money on betting markets.

Although the perpetrators of the NK Travnik scam were subsequently arrested and jailed, incidences of outside sponsors funding training camps continue. Training camps, particularly in Turkey, but also in Cyprus and in parts of Eastern Europe such as Slovenia, are offered

Figure 7. Money made on fixing friendlies involving NK Travnik in Switzerland

Date	Opponents	Stake	Winnings
26/6/2009	Sion	€219,000	€196,000
27/6/2009	Winterthur	€104,000	€93,000
1/7/2009	Neuchatel Xamax	€50,000	€28,000

⁶⁷ Numerous attempts were made to engage with the TFF for this report but no responses were received.

⁶⁸ MFA Integrity Officer Newsletter No50 15/6/2016.

⁶⁹ <https://theblacksea.eu/stories/football-leaks/cypriot-deception/>

to clubs at reduced cost or even no cost according to sources interviewed for this report. New investors also arrive at clubs and suggest the team go to a training camp in a new location.

Match agents typically work for clubs on a flat fee or percentage basis. With larger clubs, the potential of selling TV rights or tickets to matches played in training camps is more likely, as it is sponsorship. For smaller clubs from leagues where trading at a deficit is endemic, playing matches abroad against clubs from a third country is unlikely to generate any significant amount of TV rights. Setting up to sell tickets could also cost more than any gate receipts would generate, but match agents still face costs in terms of hiring match officials and venues.

Clubs that are involved in training camp manipulation tend to come from leagues, often in Eastern Europe, where financial instability is

endemic and, as noted by UEFA: “profitability remains the exception, rather than the rule.”⁷⁰

In 2018, the number of leagues where clubs reported an aggregate net loss of more than 20% rose from 11 to 13 and clubs in seven leagues - Israel, the Czech Republic, Georgia, North Macedonia, Latvia, Kosovo and Gibraltar - reported net losses of more than 30%. Yet, clubs from most of these places regularly attend training camps abroad that can cost €20,000 and often frequently more.

The lack of regulation of the training camp market creates clear integrity problems that are being exploited by match-fixers. This problem is likely to continue as financial instability worsens in the aftermath of coronavirus and, in the current situation, fixing within training camps offers a financial incentive with a low risk of any punishment.



⁷⁰ The European Club Footballing Landscape – Club Licensing Benchmarking Report Financial Year 2018 (UEFA, 2020) P115

CASE STUDY

Raków Częstochowa vs Mariupol (Club Friendly)

Introduction

This match was a club-level friendly played between the Ukrainian Premier Liga side FC Mariupol and Polish side Ekstraklasa side Raków Częstochowa. It took place on the 16 January 2021 at the Asteria Kremlin Palace in Belek, Turkey.

This region is regularly used as a location for a “winter break” training camp for European club football teams. Organisers mainly target countries where there is a break in domestic leagues across Europe, which was the situation for both Raków and Mariupol.

Organisers of these winter training camps look to offset costs and possibly make money through sponsorship arrangements and it can be seen from the footage still available on YouTube that one of the sponsors of this particular training camp was forBET, a Polish betting company.⁷¹

matches to offer customers, particularly in Asia, during the European winter due to a number of leagues in Europe that have a mid-season break.

However, there is a more sinister side to the predicament betting operator’s face in the winter months. In recent years, as already stated, there have been repeated question marks about the integrity of matches at training camps across Europe as they present the ideal opportunity for ‘unscrupulous elements’ to make money from the betting markets by fixing matches, including manipulating specific outcomes. In some cases, organised criminality can be behind the fixing, or on occasions the ‘unregulated match agents’ that specialise in organising these training camps.

In recent years across Europe, it is more likely to be connections of the clubs, including the owners, directors or managers looking to keep their clubs financially viable. As these games are friendlies, nothing rests on the outcome, so it is easier for club owners or management to persuade players or match officials to manipulate the fixtures.

Friendly matches played by these clubs in neutral locations are also an easy target as



Source: <https://www.youtube.com/watch?v=NQ27q4EXcio>

Sports data and betting monitoring company Genius Sports supplied data to betting operators for this match and a number of international betting operators offered markets on the game. This may seem surprising given it was low-level friendly involving two club teams that few football fans outside of Poland and the Ukraine would recognise, but they need

they often take place ‘under the radar’ of the national association of the host country and their respective own associations. As regards the level of permission the teams gained from their respective national associations for this particular match, the Ukrainian Association of Football (UAF) state they were notified about Mariupol’s attendance at this training, while Raków did not need permission from the Polish Football Association (PZPN).

⁷¹ <https://www.iforbet.pl/zaklady-bukmacherskie>

The UAF reports that the camp was organised by a company called 'Enda Tours', who specialise in these events.⁷² Both teams denied any involvement in the appointment of match officials. To date, it has not been possible to confirm how officials were allocated and whether this was done through any of the national associations, or even establish the identity of the referee (other than he was possibly Turkish) for the above match, or whether he had the correct licence/qualifications to officiate.

It is not known whether the training camp had the necessary permission of the Turkish Football Federation (probably not) and multiple attempts to contact the TFF did not produce a response.

The early betting markets

Genius Sports and the sports data and analytics company Stats Perform both provided their opinion on the betting markets for the match and, in essence, came to similar conclusions on how the markets correlate to the outcome of the match.

Betting markets for this match were first established approximately one-hour before kick-off. A relatively small selection of known international operators including Marathonbet and Unibet, as well as Asian-facing operators such as Singbet and SBObet offered the match. Given the markets were open so close to kick-off, all these operators intended to offer live betting throughout the duration of the match.

Raków were initially established as the clear favourite, with their average opening odds set to 1.62 (8/13).⁷³ Meanwhile, Mariupol's opening odds were on 4.05 (3/1)⁷⁴ on average, whilst the draw was available at around 3.80. There was minimal betting interest seen on these markets and as such no reported integrity concerns before the match started.

However, as the match progressed, some highly suspicious betting was seen in the "Overs",

which involves betting on the number of goals being scored in the match. Soon after the match started, there were a significant volume of bets placed on there being at least four goals scored in the game, which drastically skewed the odds for the remainder of the game.

By way of example, early on in the match (the 9th minute), the Asian betting operator Singbet was offering odds of 2.02 (which is just above 'evens')⁷⁵ on there being four or more goals in the match, but by the time the match had progressed to the 33rd minute, these odds had steadily fallen to 1.77 (approximately 4/6). This reduction in price⁷⁶ (on there being four or more goals) is completely illogical because the score in the match had remained 0-0 throughout this period. Consequently, you would expect to odds to be somewhat more attractive (at around 2.25) due to less time being available to score four goals.

A similar anomaly occurred in the "Unders" market (betting on there to be less than four goals scored). Early on the match (the 9th minute), the price on offer was 1.84. By the 33rd minute, the price had drifted out to 2.12. Again, this is suspicious as there was still no score in the match so you would have expected the price to have shortened due to the chances of there being under four goals having considerably increased. As the match progressed, the betting continued to be of concern due to the support (in terms of volume of bets placed) for there to be at least four goals in the match.

Assessment of the match footage

When viewing footage of the match,⁷⁷ it can be seen that in the first 30 minutes only five shots had been registered by both teams and no corners awarded. It was thus not a particularly open game and, as such, no indication existed that there would be many goals.

However, there are clear questions marks against the performance of the referee. Concern first arose in the 7th minute when he disallowed what looked to be a 'good goal'.

⁷² <http://www.endatour.com>

⁷³ 1.62 (the decimal price) or 8/13 (the fraction price) means Raków were 'odds-on' clear favourites to win the match.

⁷⁴ 4.05 (the decimal price) or just over 3/1 (the fraction price means Mariupol were 'odds-against' to win the match.

⁷⁵ 2.02 (the decimal price) means that there was 'even' or 50% chance on there being 4 goals (or more) in the match which at this stage of the game is an unusually short price.

⁷⁶ 1.77 (or 4/6) means that the price for there being 4 goals or more in the match is shortening (more likely to happen) – which is difficult to justify as the score was still 0-0 and less time to go in the match. The most likely explanation for this price change is considerable amounts of money being placed on this outcome – possibly because those placing the bets were very confident that there would be at least 4 goals in the match.

⁷⁷ The match can be viewed here: (<https://www.youtube.com/watch?v=NQ27q4EXcio>)

Then, as the game progressed, he awarded what can only be described as ‘three dubious penalties.’ The first of which was even re-taken after the player initially missed his spot kick, scoring on the second attempt. However, it is the last two penalties that are of real concern as they were both awarded in the dying minutes of the game (after the 89th minute). In addition, it is clear from the footage that there is no obvious rules infringement that justifies either being awarded.

Comparison of the betting alongside the match footage

The final score of 2-2 very much correlates with suspicious nature of the betting which successfully predicts there would be four goals or more in the match. However, suspicion about the integrity of the match is further heightened when the match footage is considered alongside the betting. The first incident of concern is that the referee disallows a goal early on. He indicates it is for a push on an opponent by the player scoring the goal, but this does not appear to be the case in the footage. The likely reason for disallowing the early goal is that the fixers were yet to place all their expected bets and not allowing the goal helped keeping the odds attractive.

The next incident of concern is the referee ordering a penalty to be retaken for no obvious reason, then finally awarding two highly dubious penalties when the match appeared to be petering out to a 1-1 draw. In summary, the only rational conclusion that can be drawn from the suspicious betting alongside the performance of the referee is that he deliberately manipulated the game to ensure that at least four goals were scored, meaning the bets would be successful.

Post-match reaction

Soon after its conclusion, doubts about the integrity of the match began to surface on social media. After the game, the coach of Raków, Marek Papszun, said:

"It is difficult to relate in any rational way to what the Turkish referee was doing. I don't know what drove him. Perhaps it was about some unfair practices. I hear something similar has happened in the past in training camps. However, for the first time in my life,

I have seen something like this with my own eyes. At one point, we realised with the entire training staff that we had no influence on anything. We looked at it helplessly.”⁷⁸

Mariupol reported their concerns to the UAF who in turn complained to FIFA, although they then referred the matter to UEFA to deal with as the match did not come under their remit.

Subsequently, a number of other stakeholders raised concerns about the integrity of the match, including the betting data (and monitoring) companies Genius Sports, Stats Perform and Star Lizard, which all expressed serious reservations about the integrity of the match grading at the very top end of their scale which is 'highly suspicious'. Genius Sports and Stats Perform openly said they will be very wary of offering games from this region to betting operators in the future.

The PZPN also decided to change their rules for clubs playing matches in training camps abroad. PZPN integrity officer Adam Gilarski commented:

*"From next season, it is necessary to introduce information procedures for the organisation of friendly matches during preparatory camps especially in Turkey or Cyprus."*⁷⁹

Options for follow-up investigation

To date, it has been difficult to establish whether any meaningful investigation has taken place. This should have happened as together with the highly suspicious nature of the betting markets, the dubious decisions made by the referee and the fact that all the suspicious bets were successful, it appears likely that the match was manipulated to defraud betting operators.

This apparent lack of action means there are a number of investigative avenues that remain outstanding. The most obvious involve the referee, as there is strong evidence from the match footage to suggest that the referee perpetrated the manipulation. However, he cannot have been acting alone as many of the suspicious bets were placed after the match started. However, his identity remains unknown to both teams and the authorities, as does the

⁷⁸ Interview by Maciej Wasowski. 16-1-2021.

⁷⁹ Email 10-4-2021

identity of his accomplices.

It is possible that the referee orchestrated the fix and then relied on the accomplice(s) he recruited to place the in-running bets. However, the more likely scenario is that the referee was recruited by others unknown and was paid by then to carry out the fix. Who that was would of course be the focus of any investigation with the most obvious candidates being any one of or combination of:

- Individuals connected to the clubs
- Connections of the training camp organisers Enda Tours
- An organised crime group.



Source: <https://www.youtube.com/watch?v=NQ27q4EXcio>

Other unresolved investigative avenues include establishing the identity (and geographic location) of those behind the suspicious bets. This would involve approaching the relevant betting operators for assistance.⁸⁰ Once this is known, the investigative direction would be searching for connections between those placing the bets and the individuals directly involved in the fix. However, more than 12 months after the match, it appears that no meaningful progress has ensued. Consequently, those responsible for the fix, including the referee, probably continue to be involved in football. In addition, there continues to be no deterrent to others thinking of planning a similar enterprise. Furthermore, just as importantly, no meaningful regulation of training camps and the friendlies that take place within them was implemented, nor a structured oversight of the officials appointed for these matches.

The delay?

The delay in this particular investigation is undoubtedly caused by a number of complex issues that are also relevant to numerous other past suspicious friendly matches at these types of training camps. The first major hurdle is the 'jurisdiction of the investigation'. Once the match finished, the responsibility of any investigation into any suspected malpractice needs to be established. The referee through his suspect action could have committed a criminal offence in Turkey, so is it the responsibility of the police to deal with the matter? This option can be very quickly dismissed through the limited perceived importance of the match (not part of a competition) that was between teams from outside of Turkey and therefore not a 'priority crime' for the police, which is likely to be the case in many European countries.

Potentially, there is a case for the match to be investigated by the police where the crime was initially planned, which was most likely Poland or Ukraine. However, again, neither would see this as a priority crime, and the investigation would also be put off by the geographical complexities related to the fact that the main element of the offence was committed in Turkey, while the planning and execution most probably elsewhere. Geographical international barriers would also inhibit national associations of the three countries to launch an investigation, so this responsibility would be left to UEFA. Enquiries by this ERASMUS project as to what progress is being made by UEFA are on-going, but they have confirmed that they are looking into this match.

Conclusions

Investigating the suspected manipulation of a friendly football match, especially those taking place at a European training camp in neutral country is de facto going to remain the responsibility of UEFA. The local police and national football associations are highly unlikely to be interested due to the already stated reasons but questions around this match, like many other suspicious matches of this nature, remain unresolved mainly because of the logistical and geographical complexities of such an investigation.

⁸⁰ Any suspicious betting identified by IBIA would have been passed on to UEFA at the time.

CATEGORISATION AND METHODOLOGY OF FIXING A FRIENDLY

Categorisation

The Convention on the Manipulation of Sports Competitions (the Macolin Convention) coordinates the efforts of individual countries in the detection, prevention and punishment of those involved in match-fixing in football, especially where corrupt betting is involved. Article 3 of the Macolin Convention set out the definition of the manipulation of sports competitions and in 2018 this was updated to restrict:

“the use of the term “match-fixing” (whether this includes fixing the entire event, a tournament or one part of it) purely to the on-venue action, through which the manipulation is implemented; the “match-fixing” is therefore a part of the manipulation, rather than a synonym. In this context, it links and distinguishes the two aspects, “on” and “off” the sport venue, and guarantees that with regard to the Macolin Convention, they are equally important when defining the nature of the manipulation.”⁸¹

In 2020, the Council of Europe and the Group of Copenhagen, which is the network of National Platforms designed to bring together all those with an interest in preventing match-fixing, developed a Typology of Sports Manipulations. The aim of this framework was to classify:

“the different types of competition manipulation that could fall within the definition provided by the article 3 of the Macolin Convention. The Framework promotes clearer communication across the Group of Copenhagen about the types of manipulations that National Platforms will likely encounter. The Framework also provides a basis upon which uniformed statistical information can be collected to help the Group of Copenhagen members identify areas of risk or emerging threats.”⁸²

By using this tool, the fixing of friendly matches can be categorised into as a Type 1A manipulation, which is ‘direct interference in the natural course of a sporting event or competition instigated by exploitation of governance’.⁸³

As the research for this project shows, friendly matches played by many European clubs in many (although not all) European countries are contested in a governance and integrity vacuum.

The instigator of a Type 1A manipulation is categorised as an official of a sports club, team or sports organisation who holds a dominant position. The players’ survey for this project shows that 19% of respondents believe that the instigators of fixes were by club officials.

The executors of Type 1A interference are categorised as athletes, and competition officials. The survey research for this project shows that 14.8% of respondents believe that the instigators were fellow players and 9.4% were match officials.

According to the COE typology, pressure applied, request made or bribe paid by the instigator is how the attempted aim is achieved to unfairly influence the natural course of a sporting event or competition, or to competition officials to apply bad or unfair decisions during an event or competition.

The main reason for the instigator to organise the manipulation is to abuse betting (e.g., sports participants are coerced to lose an event or competition and the instigator places bets on the pre-determined outcome).

However, it should be noted that there is also an element of opportunism within all fixing, and friendlies in particular, which means these games could be categorised as Type 1C within the COE typology. These manipulations involve direct interference in the natural course of a sporting event or competition, but the instigators include person(s) outside of the jurisdiction sports organisations (e.g., these may be personal associates of the executor or individuals involved in criminality). This would also include match agents, who are having indirect influence on the players as the executor with the complicity of club officials.

⁸¹ Convention on the manipulation of sports competitions – The Macolin Convention (CETS n°215). Updated concept of manipulations of the sports competitions 8/11/2018.

⁸² <https://www.coe.int/en/web/sport/typology>

⁸³ Typology of Sports Manipulations – Interactive Typology Tool (Council of Europe, June 2020), p6

The financial reasons for an instigator for a Type 1C manipulation are also the key drivers for fixing friendlies:

- to abuse betting (e.g., sports participants deliberately lose an event or competition and the instigator places bets on the pre-determined outcome)
- to facilitate money laundering (e.g., organised criminal groups using competition manipulation as a vehicle to clean their criminal funds via the abuse of betting)
- other illicit practices

Further research findings

Information collected during the research from actors within or connected to match-fixing groups show they have a clear understanding of the components necessary to successfully secure a financial return from the manipulation of a friendly match, while minimising detection.

Unless matches are offered on betting markets, particularly in Asia, where games are less likely to attract suspicion due to a highly liquid market, there is no prospect of fixers making any financial return from any manipulation of a friendly. While manipulation of competitive league or cup matches can produce other rewards, these are not available for friendlies. As such, these games are mainly manipulated for financial gain, primarily on betting markets.

Where clubs are frequently the instigators of any manipulated friendlies, these fixtures are routinely advertised or promoted on social media to attract the attention of data companies. Once clubs know that representatives of data companies - typically known as data scouts, who collect and transmit match data - are inside the stadium and transmitting data that is used to offer in-play betting, then manipulations can be carried out.

Clubs and outside actors trying to manipulate games also seek to ensure that matches are streamed live on the Web. This combination of live streamed games and live data are even more likely to ensure that games are offered by betting companies on Asian betting markets.

Livestreams of friendly matches, particularly low-key games played in a neutral location during training camps, or at a time better suited to attracting large numbers of Asian bettors that will increase liquidity and mask bets from manipulators, are indicative of the methods used by fixers. This also applies to the manipulation of games by officials.

If no data scouts are present, the manipulations can be cancelled. Similarly, if betting companies are restricting stakes for bets on games or not offering bets that fixers favour, for example the scoring of a total of 4-6 goals in one game on Asian handicap, which is particularly common in suspicious friendlies, the proposed manipulations can also be cancelled.

In the case of NK Travnik, according to police sources, the organisers of the club planned to fix all six matches arranged during the trip to Switzerland. However, there was insufficient evidence for the match against Servette Geneva. In addition, fixtures against Young Boys and Schaffhausen, were not offered on betting markets and the manipulations were cancelled. NK Travnik matches that were effectively fixed showed declining returns between the first and the third fixtures. Similarly, bribes reportedly paid to referees during a training camp in Turkey in early 2013, also allegedly organised for match fixing, showed a decline, which suggests lower expected returns from organisers.⁸⁴

PFK Sumy, the Ukrainian club who were involved with more suspicious friendlies between 2016 and 2020 than any other club according to the database built up from this project, earned \$10m from fixing over 30 matches. However, these included a large number of second tier Persha Liga matches that attracted higher levels of liquidity (and earnings for manipulation) than friendly games.⁸⁵

Anecdotal information from the research and investigation project suggests that bets on friendly matches, particularly where the clubs are the primary instigators of manipulation, are typically producing returns of below €50,000 in many different countries. This is partly because these are low profile matches and smaller bets

⁸⁴ <https://www.gsp.ro/gsp-special/investigatie/exclusiv-singaporezul-judecat-pentru-ca-a-trucat-doua-amicale-ale-stelei-nu-poate-justifica-2-7-milioane-finul-lui-reghecampf-audiat-de-procurorii-dna-in-acest-caz-513384.html>

⁸⁵ Confirmed by UAF Head of Ethics Francesco Baranca by What's App, 24/3/2021.

placed through the agent system common on Asian markets or through distributor websites that allow bettors to spread bets across different sportsbooks are less likely to attract attention.⁸⁶ Manipulators also understand that betting companies do not want to cancel games and smaller bets made across a variety

of websites will also deflect suspicion. This is why friendly matches appeal to fixers willing to accept smaller returns from a succession of games, where detection is less likely and any censure extremely unlikely, particularly given the multitude of jurisdictions involved in any prosecution.

⁸⁶ For example: <https://asianconnect88.com>

POSSIBLE NON-BETTING RELATED REASONS FOR MANIPULATING A FRIENDLY

In competitive matches, games can be manipulated for a variety of non-betting related reasons and these games make up a far greater proportion of fixed matches. A large-scale international study coordinated by Ghent University suggested that as few as 10% of approaches to fix a match were betting related.⁸⁷

Competitive matches can be manipulated for league placing or qualification for UEFA competitions, both of which will produce a financial reward for the clubs involved and can result in some betting-related activity if news of any manipulation spreads.

Friendly matches – by their very nature – offer no such benefits in terms of aiding league position or European qualification. The dearth of regulation around friendly matches creates a lack of transparency. As shown, this is being exploited for betting reasons, which is the primary driver for any manipulation in non-competitive matches.

However, here too, other types of manipulation must also be considered. These include manipulation of matches to boost the profile of a team and a manager in preseason, or to increase the value of players that clubs are looking to transfer. Anecdotal reports suggest clubs are approached to lose games by clubs from other countries to bolster the confidence of their players before a season starts.

Typically, these games involve opponents outside of UEFA. However, in Moldova, a club was approached to lose a preseason friendly by the opposition manager solely to make the opposing team appear well prepared ahead of the forthcoming league season.⁸⁸

Using matches that have no competitive value to boost the value of players available

for transfer cannot be discounted, as this has already occurred in competitive matches. One football scout operating in Eastern Europe reported:

“I began to notice a few ‘knowing looks’ exchanged between them at every assist and goal from the wunderkind and eventually realised the whole game was a set-up, a showcase for his undoubted skills to shine unreservedly.”⁸⁹

Tor-Kristian Karlsen, football scout

This was in a league match, but the author also notes “manipulation of various kinds seems all too easy to achieve.” Given the unregulated environment of friendly matches and the number of Eastern European clubs playing in training camps abroad, particularly during the midwinter break, similar types of deception cannot be ruled out in non-competitive matches.⁹⁰

Clubs can play friendly matches that do not immediately appear to make any commercial or footballing sense, venturing to obscure destinations or changing long-standing preseason arrangements. This is often related to changes in ownership with overseas investors wanting to take their new club to their own country. Clubs can also play seemingly meaningless matches to satisfy sponsors, particularly during the worst of the COVID-19 pandemic, when clubs were playing friendlies to comply with sponsorship agreements that stipulate a certain number of fixtures be played.

While the majority of these matches and training camps are perfectly legitimate and are often connected to commercial arrangements at clubs, the rationale for some overseas trips remains hard to understand, given the cost of training camps and the poor financial condition of the clubs involved. For example, a 2019 three-match tour in Belgium by Greek second division club Panachaiki was led by a former bookmaker convicted for fraud with links to offshore entities. Many of the concerns raised about this tour, which took place without the knowledge of the Royal Belgian Football Association, remain unanswered (see

⁸⁷ <https://www.eposm.net/kopie-van-persbericht>

⁸⁸ Interview with Evgheni Zubic, integrity manager at the Moldovan Football Federation, 8/4/2021.

⁸⁹ <https://www.theguardian.com/football/blog/2013/mar/14/match-fixing-player-sold>

⁹⁰ See: https://www.reddit.com/r/SoccerBetting/comments/4sz01x/should_i_abstain_from_betting_on_the_club/

intelligence report, appendix 7).

The multi-jurisdictional commercial transactions involved with training camps and clubs' involvement with previously unknown outside bodies that subsidise these trips, combined with the lack of regulatory oversight, also provide a clear potential for money laundering.

In 2019, the European Union cautioned about the potential for this: “Professional football’s complex organisation and lack of transparency have created fertile ground for the use of illegal resources. Questionable sums of money with no apparent or explicable financial return or gain are being invested in the sport.”⁹¹



⁹¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52019DC0370>

THE GLOBAL BETTING MARKET

Sports Betting Market Overview – Growth & Trends

The global betting markets comprise regulated markets that are overseen by a statutory regulatory authority and conform with licensing parameters, and unregulated markets, which are not overseen/no licensing parameters. Both have grown significantly in recent years, driven in particular by betting on football. The following forecasts from consultants H2 Gambling Capital categorise sector activity into three markets:

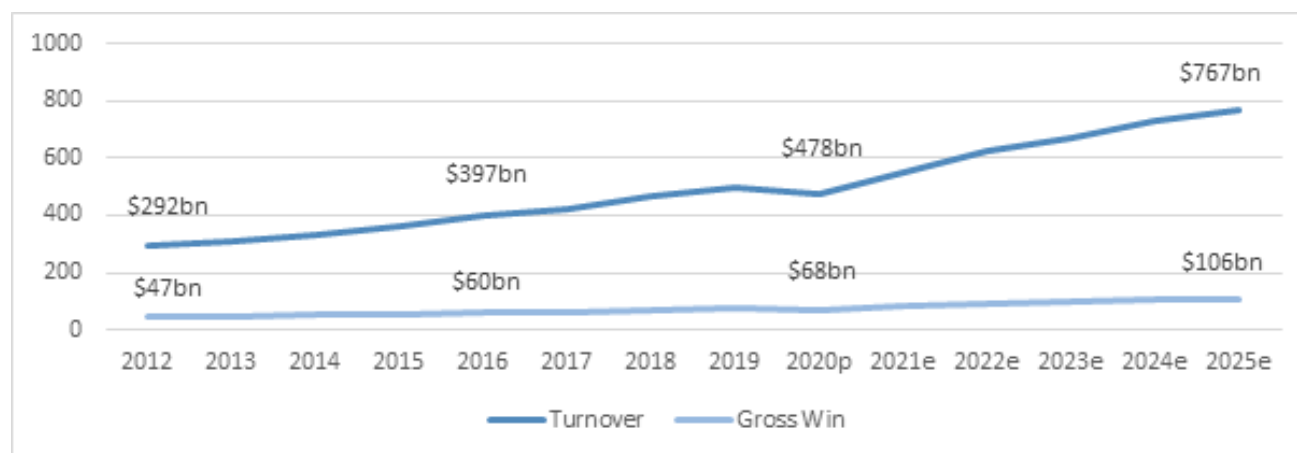
- ‘White market’ - betting where the operator is licensed ‘onshore’ in the same jurisdiction as the bettor is located
- ‘Grey market’ - betting where the operator is licensed ‘offshore’ in a different jurisdiction
- ‘Black market’ - betting where the operator is completely unregulated or illegal.

The forecasts provided here are based solely on the ‘white’ onshore and ‘grey’ offshore regulated betting markets and do not include the unregulated ‘black’ market.

Betting is a high turnover, low margin business. The global regulated market generated \$74.1bn of gross win in 2019 from circa \$490bn in turnover. This gross win is forecast to increase to an estimated \$105.7bn by 2025 from circa \$770bn in turnover. In 2019, this figure represented 16% of all gambling gross win. Gambling included betting, casino/poker, bingo, lotteries and gaming machines. Betting is the fastest growing gambling segment and is forecast to grow at over double the rate of the overall gambling industry over the next five years.

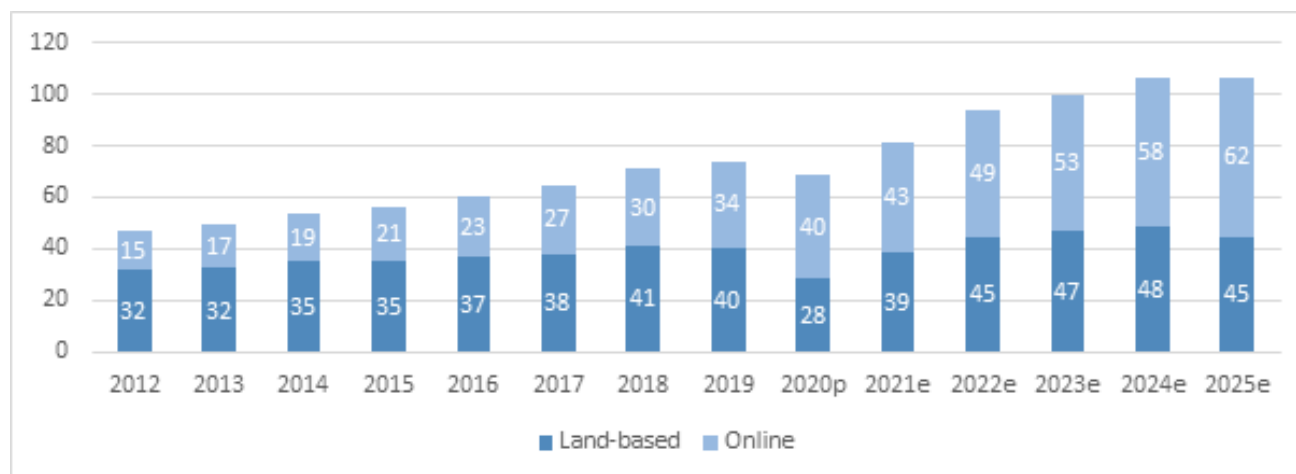
Online betting is the fastest growing segment of betting. It has been growing substantially faster than land-based betting for a number of years. In 2019, online betting accounted for 45% of all betting gross win. In 2020, H2 calculates that online betting will account for more gross win than land-based for the first time. Although this was primarily due to the enforced closure of retail betting shops during the pandemic, online is forecast to remain the dominant channel going forwards.

Figure 8. Global Betting Turnover and Gross Win 2012-25e (US\$bn)



Source: H2 Gambling Capital, May 2021

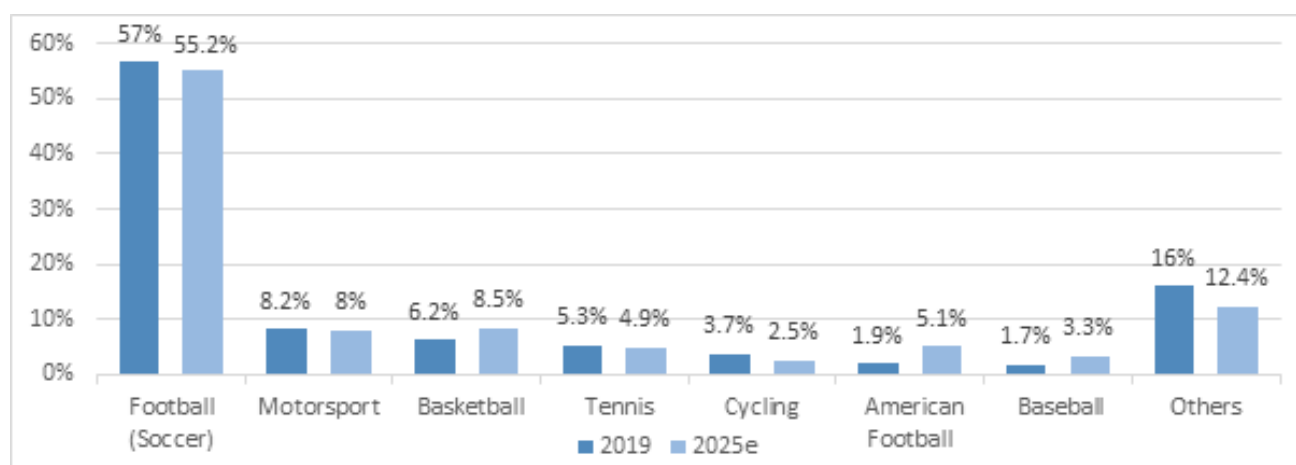
Figure 9. Global Betting Gross Win – Land-based vs Online 2012-25e (US\$bn)



Source: H2 Gambling Capital, May 2021

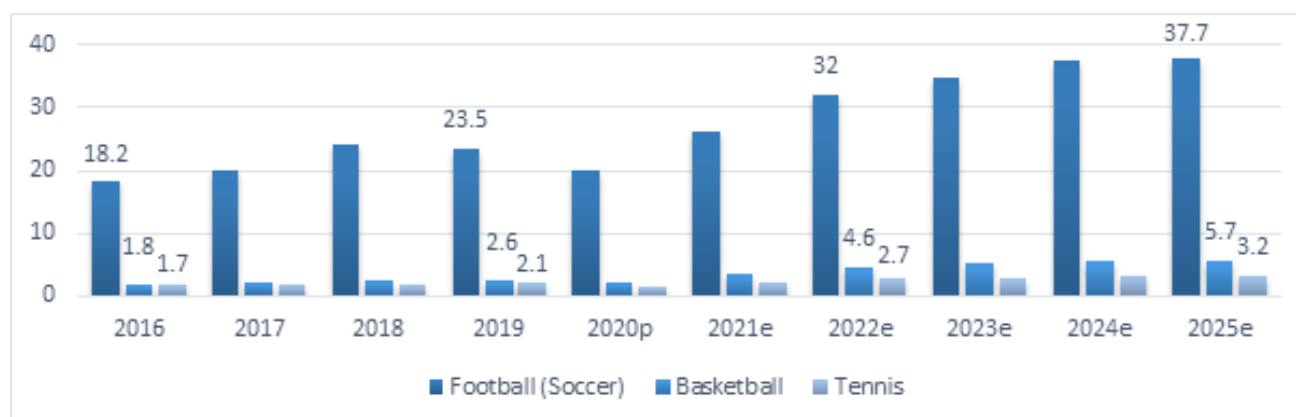
Football is by far the largest sport for sports betting, followed by motorsport, basketball, tennis, and cycling. However, motorsport and cycling are significantly skewed by the huge onshore betting market in Japan, where betting on Kyotei (motorboat) and Keirin (cycling) account for 93% and 98% of the global market for these sports. In terms of truly global betting, football, basketball, and tennis are the largest products.

Figure 10. Split of Global Sports Betting Gross Win % by Sport 2019 & 2025e



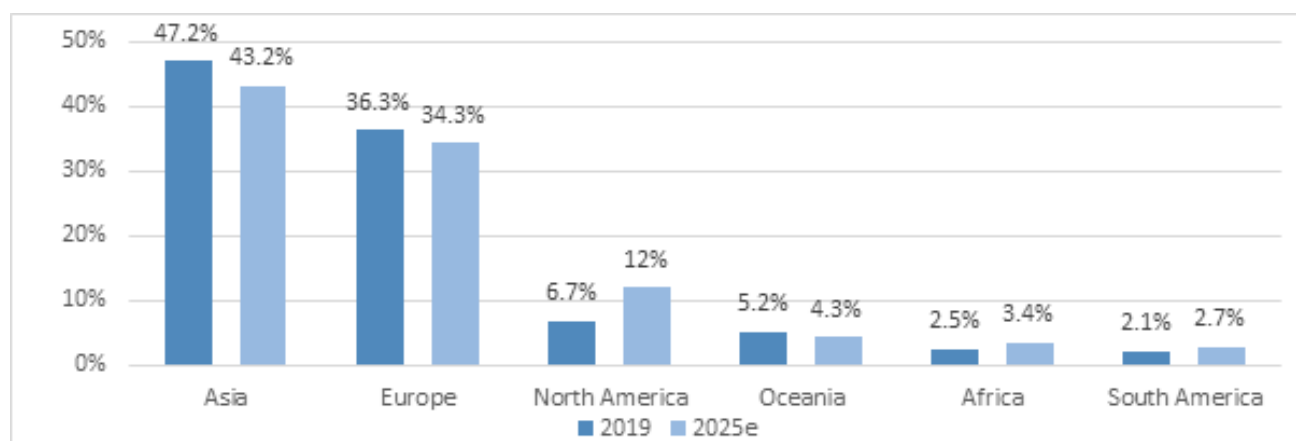
Source: H2 Gambling Capital, May 2021

Betting on football is expected to grow from \$23.5bn in 2019 to an estimated \$37.7bn in 2025, which will represent 60% growth over this period. Tennis betting will see growth of over 50% from 2019 to 2025, reaching an estimated \$3.2bn (from \$2.1bn). Basketball betting through regulated operators is, however, expected to more than double from \$2.6bn in 2019 to \$5.7bn in 2025e.

Figure 11. Global Gross Win for Football, Basketball and Tennis 2016-25e (US\$bn)

Source: H2 Gambling Capital, May 2021

In terms of all betting activity by region, Asia had the largest share in 2019 with almost 50% of all betting gross win. This is predominantly driven by the large onshore betting monopolies in China, Japan and Hong Kong. The global market share for Asia and Europe (36% in 2019) is expected to fall, with North America nearly doubling from 6.7% in 2019 to an estimated 12% by 2025 as the US market has opened to allow betting following the repeal in 2018 of the Professional and Amateur Sports Protection Act of 1992 (PASPA). Around 20 US states are now offering betting either through land-based facilities, online or both.⁹² Africa and South America are also expected to increase their share of the market by 2025.

Figure 12. Total Betting Gross Win % by Continent 2019-25e

Source: H2 Gambling Capital, May 2021

For online sports betting, Europe had the largest share in 2019 with over 50%, followed by Asia with around 30%. Both are forecast to lose market share, falling to an estimated 45% and 27% respectively by 2025. North America is expected to more than double from around 8% in 2019 to an estimated 19% in 2025. South America is also expected to double to 1.8%, with Africa rising to 3.4%.

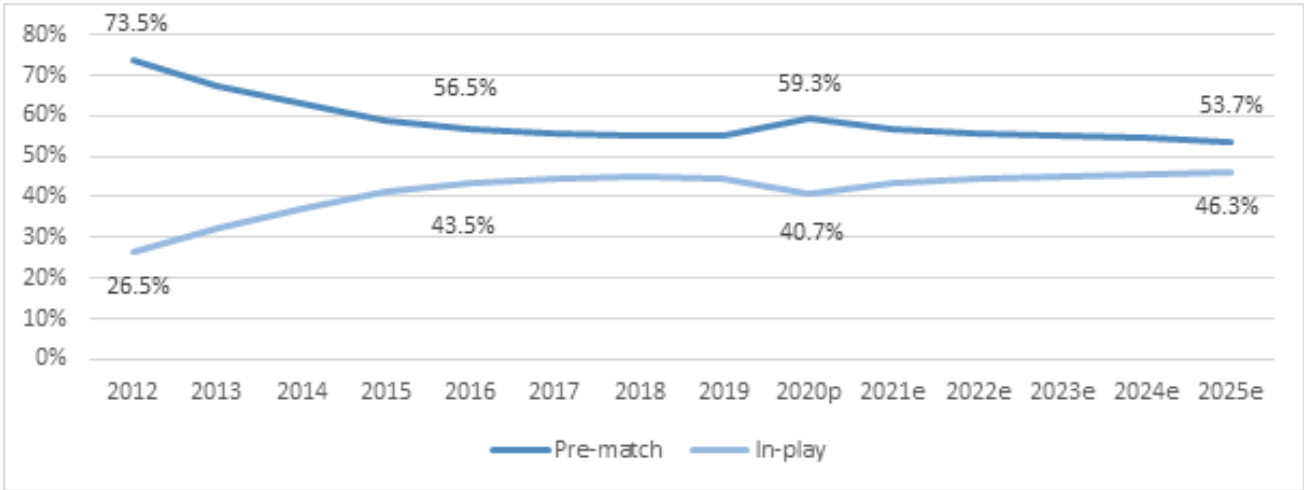
In-play betting and mobile are both key drivers of online sports betting gross win and are expected to continue to be the main growth drivers over the next few years, with mobile doubling over the 2012-25 term reaching an estimated 61.7% of all online betting by 2025e (up from 30.5% in 2012).

For sports betting (excluding racing), in-play will account for an increasing share of the regulated market globally. It is estimated to reach 46.3% of the market by 2025 (up from 26.5% in 2012), driven by increasing consumer demand for that product.

⁹² <https://www.legalsportsreport.com/us-betting-sites/>

Figure 13. Global Pre-Match vs In-Play Online Sports Betting Gross Win % 2012-25e

Source: H2 Gambling Capital, May 2021



ROLE OF BETTING OPERATORS & EUROPEAN BETTING REGULATION

A study was conducted in January 2020 to collate data and examine the number of European friendly football matches offered for betting by IBIA's regulated betting operator members. The questions asked are available in appendix 8. The following data relates to 2019 figures and covers responses from around half of IBIA's membership at the time that the survey was conducted. Given the size of those operators, this is likely to be significantly higher in terms of IBIA members' total turnover on European friendly football matches.

IBIA members represent many of the largest regulated betting operators in the world and the results can therefore justifiably be regarded as a reliable picture of the availability of betting on European friendly matches across the regulated global betting market.

Up to 125,000 football matches globally were offered each year at the time of the survey, albeit falling to as low as 55,000 for a minority of operators. Many operators did not split friendly matches by continent and there were some variations in how many friendly matches each operator offered. This ranged from 1,650 to 7,500 matches, representing 3% to 6.5% of all football matches offered worldwide by those operators.

Weighting these by size of operator (and therefore customer base/size), this suggests an average of around 4,000-5,000 friendly matches were offered on global football, representing 4-5% of the total number offered for betting. Using figures from those operators that could provide a European/non-European split, it is calculated that an average of 3,000-4,000 European friendly matches per year were offered for betting through regulated betting operators alone.

The data to facilitate the generation of betting markets on football friendly matches was primarily provided by specialist companies Sportradar, Genius Sports and STATS Perform. In many cases, these data companies provided 100% of the data used by betting operators. A couple of operators report using some event organiser or website data, but, in general, betting markets appear to have been 99%+

generated by information from a data provider.

How that data was collected (e.g., scout at the venue and/or scraped from a website), whether that was obtained through an official agreement (or not) with the event organiser and other reliability issues are considered in other sections of this report, in particular in the next one on the role of data providers.

On that latter issue and the robustness of the data supplied, betting operators stated that they expect the data provider to take all reasonable measures to ensure the reliability of the event information provided. This included that the data be generated through scouts at the venue providing information such as the location, kick-off time and verifying the teams playing.

Some betting operators also stated that they prefer to offer friendly matches which are available for live streaming/broadcasting. Whilst operators generally do not offer these matches live streamed on their website for customers, the betting operators do watch live streamed matches where available to ensure that the data is correct and to verify the most relevant information such as the scores or scoring times.

Gambling Regulator Survey

The project also explored a number of betting and data related issues with gambling regulatory and licensing authorities in Europe. A survey containing three main questions was sent to 34 regulators in European jurisdictions in April 2021. Answers were received from 14 of those authorities. A final 'any additional information' question was also added. The project is grateful to those authorities that responded.

The first question sought to ascertain if regulatory authorities and/or the regulatory framework in each jurisdiction placed any restrictions on their licensed betting operators offering betting markets on friendly football matches. This could be in the form of restrictions on the types of matches consumers are allowed to bet on and/or the types of bets allowed to be offered on those events.

Of those 14 regulators that responded, only the French regulatory system places any restrictions, which prohibits betting on club friendly matches and only permits betting on international friendly matches involving FIFA's top 50 ranked national teams.

The Netherlands also introduced restrictions under its new Remote Gaming Act from October 2021, which prohibit licensed operators from offering bets on friendly matches that are not organised under the supervision of FIFA, or by one of its confederations or a national association. For those friendly matches that are permitted, licence holders must conduct a pre-event risk analysis and refrain from offering bets where concerns of manipulation are apparent.

While it did not respond to the survey, Sweden has also introduced restrictions from the start of 2021 that ban the offering of betting on training on all friendly matches, except where U21 national teams up to national A-teams participate.

Apart from France, Sweden and the Netherlands, the approach in the majority of countries is to allow betting on friendly matches within the prevailing regulatory and licensing structure. It is important to highlight that, as set out in this report, betting on friendly matches is a common product offering and sought by consumers, with an average of 3,000-4,000 European friendly matches offered for betting each year through the regulated operators that responded to this study.

The countries that permit betting on friendly matches do not impose any integrity protocols specific to friendly matches, albeit those matches do fall within the scope of a range of integrity monitoring and reporting requirements. Such integrity provisions are increasingly prevalent across European regulatory framework for gambling, often reflecting the measures set out in the Council of Europe Convention on the Manipulation of Sports Competitions.

As already stated, the availability of real-time sporting event data is fundamental to the generation of betting on in-play markets, including friendly matches. The second question was therefore focused on assessing whether companies that sell data (e.g., on the teams playing, location, score/scorers and

so) on European football friendly matches to licensed betting operators are also required to be licensed and regulated in European jurisdictions (as in some cases gambling software suppliers are).

None of the European regulatory authorities having responded to this study currently require parties supplying data to be licensed, nor have any immediate plans to bring these companies within the existing licensing structure. The provision of data that facilitates betting, notably in-play markets, and the accuracy and integrity of such data, is not therefore currently under any statutorily established regulatory oversight.

The third question put to regulatory authorities asked if there are any betting regulatory or integrity restrictions on national football leagues and clubs from selling the data on their friendly football matches (either directly or through a third-party data supplier) to betting operators licensed inside and/or outside of that jurisdiction (be they regulated or unregulated).

No regulatory authorities imposed any restrictions here. This is understandably seen as a matter for sporting authorities to determine how and to whom their event data is sold. Albeit, as this study has demonstrated, the sale and availability of such data is of increasing importance in the delivery of betting markets and therefore could be argued to be of equal importance in maintaining the integrity of those events. That is especially the case where such data may be being sold to poorly or unregulated betting operators (notably outside of Europe e.g., Curaçao and parts of Asia) that do not adhere to integrity monitoring and reporting or operate under an effective regulatory framework for betting. In that instance, the sale of sporting event data to those operators may be seen to be adding to the integrity risk. Full survey responses are available in appendix 9.

ROLE OF DATA PROVIDERS

The role of data providers in sports betting is increasingly central. In particular, the importance of the global data supply chain, which involves sport selling event data to data providers, data companies collating and selling data to betting operators, and the betting operator using this data to generate markets for consumers. As a result, the importance of having a reliable, accurate and transparent data supply is critical.

Without live data coverage, betting companies cannot offer in-play betting, which forms an increasing amount of global betting turnover. In 2015, one online betting company, Bet365, revealed that 80% of all sports betting revenue came from in-play bets alone.⁹³ These types of bets are also particularly popular among bookmakers focused on the Asian betting market, where many bets on manipulated matches are placed due to the system of agents that allows bettors to remain anonymous.

The IBIA survey for this project shows that operators are heavily reliant on in-play (or live) data from data companies in order to offer matches and all betting companies offering in-play betting, whether they are onshore licensed, offshore licensed or unlicensed (illegal), need live data to generate betting markets. The most popular bets are on leading European leagues. In 2019, the association of European professional football leagues (European Leagues) agreed an expanded data rights deal with Genius Sports, Sportradar and STATS Perform for data rights concerning 16 top-tier football leagues across Europe.⁹⁴

Sportradar has a contract with the Deutsche Fußball Liga (DFL) to monitor European club football friendlies involving sides from the top two national leagues. Genius Sports also monitors the same Bundesliga clubs in a separate deal with the Deutscher Fußball-Bund (DfB) as part of a contract for league matches, but this is rare. One data company interviewed

for this project said: “Not many sports would ask for friendlies to be monitored.” Contracts for national leagues rarely include non-competitive matches as these can be from different countries and monitoring is often only practical when clubs play in friendly tournaments. Even then, this is not common, certainly at lower level clubs.

The incidents of ghost games in 2014 and 2015 (see p6) would not have occurred without the complicity of data scouts, who are often students and the level of wage may, like poorly paid sportspeople, leave them vulnerable to advances from corrupters. Subsequently, data providers tightened their risk management procedures to avoid a repeat.

The outbreak of the COVID-19 pandemic in 2020 again highlighted weaknesses in the data management supply chain, with friendly games arranged simply to defraud betting companies (see case study p21-22). This was not restricted solely to football and incidents of fake games created for the same purpose emerged in cricket.⁹⁵

Survey of national football associations on data company regulation

Commercial agreements for data rights in club football friendlies are rare. So, as part of this project in the survey of national football associations (see p8-9), a supplementary question was asked about the registration and regulation of data companies and their representatives (aka data scouts) at friendly matches to all 55 members of UEFA. Of those 21 national associations that responded, 75% said that data scouts were not required to register attendance with the host club.

In Austria, the ÖfB reports that some clubs will eject data scouts if they are discovered at training matches in order to stop games before they can be offered on betting markets. Many associations had not even considered this aspect of the organisation of friendly matches and their typical response was that responsibility for checking the credentials of data scouts lay mainly with the clubs.

⁹³ <https://www.online-betting.me.uk/news/bet365-reveal-80-of-sports-betting-revenue-comes-from-live-in-play-betting>

⁹⁴ <https://media.sportbusiness.com/news/european-leagues-widens-data-rights-deal-with-genius-sportradar-and-stats-perform/>

⁹⁵ <https://www.deccanherald.com/sports/cricket/fake-sri-lankan-cricket-tournament-in-india-busted-857161.html>

Comments from federations who did not require registration included:

- *“Data scouts are coming to more games including friendlies, even U16 and U15 games. We ask them to identify themselves and if they don’t, they have to leave” (Belgium)*
- *“By the time that the friendly game is open and not behind close gates, we are not required to register any data scouts. It’s not controllable.” (Cyprus)*

Comments from the 25% of respondents that did require some form of registration by data scouts included:

- *“The policy of NFF is that for every match organized by NFF or our member clubs, only persons representing media houses or who hold official press-IDs are given entrance with the right to report from a match. Unless the data scouts fulfil these requirements, they will not be given the right to report and will have to buy a ticket and attend the match as ‘normal’ spectators.” (Norway)*
- *“The club that organises the match is recommended to require accreditation from the data scouts who wants to report from non-official ‘friendly’ matches.” (Sweden).*

Data provider survey

To better understand the links between data companies and their clients in the betting market over non-competitive matches in Europe, a range of data providers were sent a questionnaire in 2020 comprised of 10 questions (see appendix 10). By prior agreement and to protect commercial confidentiality, responses were treated confidentially.

The number of friendly matches in Europe that are covered by data companies ranges from 2,000 games (5% of European coverage) to 3,000 games (6.8% of European coverage) and up to 6,000 games (14% of European coverage). One data company noted that “a lot of friendlies come out of existing data agreements” and another agreed that

commercial rights can be agreed for some friendly matches, but added: “Typically, friendlies do not have rights attached to them since they often bring together teams outside of rights holder owned competitions.”

The survey sought to understand what the minimum levels of information that providers generally seek to establish before offering coverage of a friendly match. Across all responses, minimum information included:

- The date of the match and the kick-off time
- The teams who are involved in the match
- The level of the squads playing in the match, i.e., are the team’s a first XI, youth, reserves, or women’s team⁹⁶
- Data companies said they take information for live coverage of friendlies from one or more of the following:
- their representatives at events (aka scouts)
- club websites
- other internet sources e.g., broadcast of the match on Facebook
- match agents and club officials

All respondents preferred a scout at the actual ground to comply with their own risk management processes, but this is not always the case and games can be offered using other sources.

Scouts are background checked prior to employment and their performance monitored using Key Performance Indicators. Typically, date, KO time and venue must be corroborated by multiple sources and GPS is collected from the device of the data scout to ensure each data collector is at the correct venue. Data scouts also asked to confirm their attendance with pre-match photos. This is to prevent any potential corruption and data being streamed from games that do not exist. An audio stream is requested and at least one data company used a mystery scouting system, where another member of staff attends games unannounced to check on scouts.

Data companies report that not all friendly matches are played over a 90-minute period, or even 45 minutes each way and can involve unlimited substitutes. One data company reported: “Just getting the information can be

⁹⁶ One respondent said they did not offer youth or reserve friendly matches.

difficult. Confirming line-ups for friendlies can be nigh on impossible.” Where matches are not played over a regular 90-minute period, coverage can be stopped, or clients informed so they can make a decision whether to cease offering those fixtures.

The data companies claimed that they tell their clients where the information is sourced. One responded that it: “informs their clients on the source of the coverage that is provided to them, in particular whether or not the source is from the venue, via an in-stadium scout, or whether the coverage is from a lower latency source, i.e., a fast stream of the match or a live TV broadcast.”

The number of friendly games that are streamed live by club or event organisers and where a data company sends a scout to provide coverage ranges from 10% to 15% according to respondents to the survey.

Procedures can be changed by data companies to stop fixers catching on and exploiting these arrangements. All of the data companies to respond said they did not scrape data from rival companies. One responded: “The percentage of data that we scrape is zero. We would not copy someone else’s data feed to provide a service. How do you investigate a problem with the data has been scraped? That’s scary.” However, some data companies that did respond implied that other data companies did scrape data from live feeds provided by rivals or live streams.

If a match is delayed, this can provide a window for bets to be placed to exploit betting operators so data scouts are encouraged to take photos of any delays. All data companies to respond to the survey say live information is cross checked and post-match checks of content that is produced are ran on the data collected. Checks include, but are not limited to:

- Checking match statistics
- Checking the timestamps of the data entries and comparing them against official reports or other sources

The amount of betting operators booking live streams from data companies for competitive matches ranges from 35 betting operators at big games to an average of 20 clients on regular games. No figure was given for friendly matches.

Data providers also claim that their customers must be licensed. One responded that: “the Betting Customer must hold and maintain appropriate regulatory licences for the duration of its agreement.”

Another data company reports that:

“It is a precondition that all bookmakers we provide services to are licensed operators. There are robust procedures to check this prior to and during any contractual agreement with bookmakers.”

It must, however, be noted that licensed does not mean regulated (or more specifically well-regulated). These are two separate processes and where the licensing in some jurisdictions e.g., Curaçao, is considered by many industry sources to be substandard relative to many European licensing jurisdictions, for example, and where the regime may lack any meaningful regulatory oversight, including suspicious betting reporting requirements. Operators in such jurisdictions may however receive in-play data to facilitate betting markets on the basis they are licensed however ineffective that licensing regime is from a regulatory and integrity perspective.

One data company said that it sold information to 150-200 companies worldwide, mostly European registered, a small amount in the US, but chose to avoid offshore operators licensed in the Caribbean. However, the ultimate licensing and regulation of an operator may be complicated. Many betting operators are licensed in multiple destinations, and so an operator may have a licence in a well-regarded regulatory environment such as Sweden (and confined to Swedish customers), but where the majority of that betting operators wider global operation is conducted through a comparably less regulatory rigorous Curacao licence, for example. Jurisdictional licensing restrictions to sporting event data may therefore be circumvented.

The licensing and regulatory oversight of betting companies varies widely across the national gambling authorities in countries signed up to the Macolin Convention, which include requirements to report any suspicious betting on sports events. This is also the case in regulatory environments currently outside of the Macolin framework such as Nevada and New Jersey, which impose integrity provisions

on licensees, to less rigorous regulatory environments such as those provided Curaçao and the Philippines. These are not known to have any comparable or robust integrity provisions.

Note on respondents to data survey.

BetGenius, Sportradar and STATS Perform all responded to this survey. At the time of the survey, IMG Arena said they were not involved in the supply of football data,⁹⁷ while Enetpulse said it does not offer betting data.⁹⁸ The following companies did not respond despite – in some cases - being sent the questionnaire on a number of occasions and via multiple different routes: BetConstruct, iSportsAPI, First Play, Goalserve, LSports, SportLevel.



⁹⁷ Email from Freddie Longe, executive vice president IMG Arena, 18/6/2020.

⁹⁸ Email from Simon Skarsholm, managing director Enetpulse, 12/10/2020.

ROLE OF NATIONAL PLATFORMS, INTERPOL, AND EUROPOL

Whilst the principal responsibility for tackling match-fixing in football remains with the relevant national or international body, they cannot address the problem alone. It has therefore become ‘accepted practice’ to use the collaborative efforts of as many interested parties as possible, with efforts coordinated by national and international platforms.

Importantly, National Platforms provide leadership and direction in the detection of match-fixing by mandating collaboration between interested stakeholders such as relevant government departments, law enforcement, and sports’ governing bodies and betting operators and regulators, particularly in the sharing of information. Each of these key stakeholders has different imperatives and priorities, different resources and a different vested interest in keeping football clean.

A current example that operates at both a national and international level is the on-going work of the Council of Europe through the Convention on the Manipulation of Sports Competitions (the Macolin Convention).⁹⁹ A positive outcome of the work of the Macolin Convention has been that a number of European countries now have ‘National Platforms’ that help coordinated the efforts of that country in detecting (and punishing) wrongdoing in sport.

Another key recommendation of the Macolin Convention is that countries criminalise certain types of wrongdoing in sport, consequently a growing number of countries globally now have specific legislation that criminalises match-fixing. This not only acts as a deterrent, but also as a mandate for the more regular involvement

of law enforcement in the investigation of match-fixing in football.

Whilst INTERPOL do not lead on investigating specific allegations of match-fixing in football, they do play an important support and coordination role. Through the Match-fixing Taskforce (IMFTF), they bring together a network of law enforcement agencies from across Europe to tackle match-fixing in football. This network allows the task force to act as a platform for cross-border investigations and international case coordination, with meetings held regularly. The IMFTF supports member countries in match-fixing investigations and operations in football and maintains a global network of investigators that share information, intelligence and best practices.

Specific INTERPOL-developed tools dedicated to data collection on sport corruption (Project ETICA) and financial crimes analysis (FINCAF) are available to law enforcement worldwide. Due to its global outreach, the IMFTF is uniquely placed to connect criminal investigative units in all INTERPOL member countries and relevant Integrity Units from the main International Sporting Federations to unite the efforts to counter any wrongdoing in sport.

INTERPOL also carries out a joint capacity building and training project with the International Olympic Committee to combat competition manipulation in football (and other sports). The project offers tailored trainings and workshops for law enforcement, government agencies, sports, betting operators and regulators, to address competition manipulation and create a global network of practitioners.

⁹⁹ www.coe.int – the convention on the manipulation of sports competitions

DATA STANDARDS

Ensuring the integrity of sporting event data

In response to integrity issues relating to sporting event data collation and distribution that emerged both prior to and during the COVID-19 outbreak (e.g., ghost and fake games)¹⁰⁰ to defraud betting operators, IBIA determined that the establishment of an agreed process for data collation would be of benefit to all parties involved in the global data supply chain: sports, data providers and betting operators.

Highlighting concerns about the adverse impact of the manipulation of data and the related corruption of betting markets, IBIA called upon all parties engaged in the supply chain of sports event data for betting to adhere to global best practice standards in May 2020. This was determined as the most effective means of achieving an approach which best serves to protect the integrity of sport, its data, betting markets generated by that data and consumers enjoying those products.

In doing so, IBIA emphasised its desire that data used by its betting operator members is a product of high levels of accuracy and transparency. The upholding of the reliability and credibility of sporting event data is of paramount importance for IBIA members. Furthermore, the challenges posed by the pandemic had further highlighted the necessity for robust data chains to be in place.

In October 2020, following a period of industry consultation, IBIA published a set of standards governing the procedure for the collation of sporting event data for betting and opened a process for all parties engaged in data collation to demonstrate that they meet those standards. The data standards document (see appendix 11) sets out three core principles for the collation of data for betting, being:

- Accurate, reliable and transparent
- Responsibly sourced and minimising risk
- Protecting against criminality or misconduct

This is split into defined sections covering:

- Personnel training
- Data collation
- Data integrity and reporting

The auditing procedure is conducted by industry specialist eCOGRA and those parties that pass the independent audit will have access to a Data Standards Kitemark. IBIA also intends to establish a Data Standards Working Group, involving relevant stakeholders, to consider data integrity issues on a continuous basis.

In January 2021, it was announced that STATS Perform was the first betting data provider to be awarded IBIA's Data Standards Accreditation for the collection and distribution of sports event data for betting. Sportradar also achieved this accreditation at the end of Q3 2021.¹⁰¹

¹⁰⁰ <http://www.insideworldfootball.com/2020/03/31/ukraine-ghost-games-fool-bookies-punters-data-firm-criminals-pull-off-perfect-crime/> and <http://www.insideworldfootball.com/2020/05/20/brazilian-ghost-game-offered-200-betting-markets-worldwide/>

¹⁰¹ <https://www.statsperform.com/press/stats-perform-becomes-the-first-sports-betting-data-provider-to-be-awarded-ibia-data-standards-accreditation/>, <https://www.sportradar.com/news-archive/sportradar-earns-international-betting-integrity-associations-data-standards-accreditation-and-kitemark/>

CONCLUSIONS

The lack of effective regulation of friendly matches has created a perception within the football sector that governance of these games does not matter and this has allowed manipulation of friendly matches to flourish. This integrity vacuum has been successfully exploited by criminals for some time. “This game has got no value,” convicted match fixer Wilson Perumal told players he had persuaded to manipulate a friendly game in 2007.¹⁰²

When opportunities for money laundering through the football sector were considered in 2009, friendlies and the training camp sector were not mentioned.¹⁰³ Subsequent joint sector initiatives to protect the integrity of the game did not even consider friendlies,¹⁰⁴ but in 2013 the lack of regulation that allows these games to be manipulated was noted by INTERPOL:

“Friendly matches, often international, are particularly vulnerable as they are less regulated than FIFA-sanctioned competitions ... Friendlies are vulnerable to match-fixers controlling every aspect of the match –from the venue selection to match officials.”¹⁰⁵

Since then, some action has been taken over international matches, but club matches remain largely untouched. This is despite a growth in the commercialisation of friendlies by large European clubs from the top divisions in England, France, Germany, Italy and Spain. Prior to the COVID-19 pandemic, clubs from these leagues would play between 36% and 53% of preseason fixtures abroad as these clubs look to establish a global fanbase.¹⁰⁶ These visits have proved particularly successful in encouraging interest amongst supporters in Asia.

These matches can be categorised as exhibition games, which is one of three categories of friendlies. As clubs are increasingly trying to commercialise exhibition fixtures, particularly in preseason, these games have a value to clubs in attracting new fans and are often played as part of commercially branded tournaments, but still lack the intensity that can be found in competitive matches. Exhibition friendlies are however less likely to be an integrity risk as, while sometimes staged by clubs from different countries in a neutral venue, these games are usually played in front of sizeable crowds and subject to heavy media exposure and often include a live broadcast.

Fig 17. Intensity of Exhibition Games

Competition	Average substitutions	Yellow Cards	Red Cards
International Champions Cup	14.6	2.1	0
Premier League Asia Trophy	15.3	1.5	0
English Premier League	5.6	3.7	0.1

Source: Opta/ICC/Premier League (2017)

¹⁰² <https://www.thestandard.co.zw/2014/05/11/day-raj-perumal-got-zimbabwe/>

¹⁰³ Money Laundering through the Football Sector (July 2009). Financial Action Task Force/Groupe d'Action Financière.

¹⁰⁴ European Football United for the Integrity of the Game (2012). UEFA/European Club Association/European Professional Football Leagues/FIFPRO Division Europe.

¹⁰⁵ 'Match-fixing in Football – Training Needs Assessment 2013'. Interpol report (2013), p15-16

¹⁰⁶ A Friendly Business? A critical evaluation of the globalisation and commercialisation of the preseason friendly. Menary, Steve (CIES 2019) P122

Regular pre and midseason friendlies not played as part of commercially branded tournaments are also usually played in front of paying crowds and may be livestreamed. They also lack the intensity of competitive matches and have less value in terms of engaging new fans.

The third category of friendly matches are training camp games, which have even less significance in terms of fans and the actual games can be even more relaxed. Managers may agree to play a shorter period than the regular 90 minutes, to change entire teams at half-time or even allow substituted players to return to the field. As a consequence, these fixtures can bear little comparison to competitive matches. Julian Neuburger, a licensed match agent at Match IQ, explains:

*"You couldn't bet on the competitiveness of certain pre-season games as so many different things are being tried out."*¹⁰⁸

These games are often played as part of what is now a sizeable training camp industry that has emerged in the past two decades and remains subject to little sporting self-regulation bar the need for insurance and the involvement of a match agent, which appears to be checked infrequently. Entire leagues are going abroad in midwinter with little or no data trail of who is involved in terms of playing personnel or officials. These games are also livestreamed, which may increase fan engagement for transnational clubs but at a lower level this is far less likely to be the case. This trend has not been sufficiently recognised at a European level but Sport Integrity Australia has noted:

"[L]ivestreaming sporting competitions has also become an important tool for Wagering Service Providers (WSP) to generate gambling revenue (particularly in offshore jurisdictions). It is increasingly common for WSPs to livestream less popular, lower tier, or even junior sports competitions to provide more wagering content."

While some national federations may take responsibility for their own clubs when engaged in friendlies, too often this is an afterthought. Identifying match officials is not always possible, while clubs can field triallists during friendly games who play one or two games and then move on to another club. The

lack of governance on this is another area that can be exploited by manipulators, who seek to defraud betting operators offering bets on friendly matches.

There is a crucial difference between the role of well-regulated, poorly regulated and unregulated betting operators. Well-regulated operators are required to report suspicious betting and do so, but less well-regulated or unregulated operators are not. Those betting operators that are not required to report suspicious betting activity or choose not to are facilitating betting on manipulated matches, unlike well-regulated operators that co-operate with sporting and judicial authorities.

Betting on friendly games may also stem not from any attempt to fix part or all of the result, but from inside information on games played in neutral locations that often get little coverage in the media. David Forrest, Professor of economics at the University of Salford, explains:

*"The amount of inside information on a friendly will be higher. That inside info could be tied up with the betting. A weak team could be fielded not for betting reasons but people can't resist using that information."*¹⁰⁹

Attempts at regulation and oversight can also be undone through contact with clubs from other countries, particularly for games in neutral countries, and the appointment of officials, who have been at the centre of alleged manipulation in a number of friendly matches.

"The clear concern is games played in neutral venues. Working out who has jurisdiction is hard to understand and getting law enforcement involved is difficult."

Affy Sheikh, Head of Starlizard integrity services¹¹⁰

Despite these integrity issues, gaps in the European football calendar due to mid-season breaks or the end of the regular season mean that there is demand from betting companies to offer bets on friendlies. While betting regulators in some countries such as France and Sweden do prohibit betting on club friendlies, this only applies to domestic markets and does not stop those matches from being bet on around the world in regulated and unregulated markets. This action therefore does not preclude these

¹⁰⁷ Interview 28/11/2019

¹⁰⁸ Livestreaming Sporting Events, Sport Integrity Australia (2021)

¹⁰⁹ Interview 11/5/2020

¹¹⁰ Speaking at STATS Perform Integrity Forum 24/7/2019

matches from being manipulated for betting purposes.

Research for this report shows that licensed betting companies offer on average between 3,000 and 4,000 European friendlies every year and some can offer as many as 7,000 games. There are no restrictions on friendly matches in licences offered by less rigorous regulatory regimes, such as those in Curaçao or the Philippines, where many of the betting companies focused on Asia seek a licence.

Around 40% of global betting revenue is generated in the Asian region and the greatest volumes come from European football,¹¹¹ where friendlies have greater credibility with bettors due to perceived higher levels of integrity. “Asian bookmakers like to offer European friendlies as they see them as more trustworthy,” says Affy Sheikh.¹¹²

Well-regulated operators are required under the terms of their licence to report suspected corruption and these operators have every

what would stop it is if organisations were more bold, and said don’t offer bets on this game.”

The European Commission claims that there is evidence that the introduction of stricter penalties reduces the levels of match fixing.¹¹⁴ These penalties combined with high wages at the top of the game has pushed the problem of manipulation down the football pyramid to smaller clubs and leagues. The ultimate end for this, certainly at club level, is friendlies and between 2017 and Q3 2021, 13% of all alerts for suspicious betting on football matches recorded by the International Betting Integrity Association were for friendly games (see Appendix 12).

Other sources show that friendly matches are more likely to be manipulated than regular games. The Suspicious Betting Trends in Global Football report found that the number of suspicious friendlies had more than doubled in 2020. This was to be expected as clubs replaced competitive matches with

Fig 18. Suspicious matches by type

Year	Friendlies	All Games
2017	1.20	0.73
2018	2.00	0.61
2019	0.67	0.56
2020	1.19	0.35

Source: STATS Perform/Star Lizard

incentive to see match-fixing eradicated as they are the intended victims of the corrupt activity. However, less well-regulated or unregulated bookmakers can profit from a fixed match by laying off money onto unsuspecting rivals, whilst well-regulated betting companies generally would prefer to discourage or prevent match fixing. “Bookmakers cannot win, as if they void bets then clients are angry and if they let the bet go and its fixed, they also lose out,” says Marco Blume, director of trading at Pinnacle.¹¹³ “If bookmakers void a match, then we are seen as suspicious and connected to the fixing. You can’t say ban all friendlies, but

non-competitive games during the COVID-19 pandemic, but only 5% more friendly matches were analysed compared to the previous year.

A combination of a lack of sporting governance and regulation around the staging of games allied to appetite from those poorly and unregulated betting companies with access to event sporting data, high market liquidity, largely anonymous customer betting and no responsibility to report suspicious matches, make friendlies the perfect target for match fixers, who know that their chances of being caught, let alone being punished, are virtually zero.

¹¹¹ <https://financial-news.co.uk/global-sports-betting-market-growing-by-more-than-10-year-after-year/>

¹¹² Interview 3/12/20

¹¹³ Interview 6/11/2019

¹¹⁴ Mapping of Corruption in Sport in the EU. A report to the European Commission – Executive Summary (December 2018)

“The final question that an internal corruptor asks themselves is whether the league or another outside force (the police or the legal system) will impose sanctions on them, if they are caught? There are effectively two parts to this question: will the corruptors be caught? And secondly, if they are caught, will there be heavy sanctions?”

Declan Hill Associate Professor of Investigations, University of New Haven. ¹¹⁵

Investigations into friendlies, let alone punishments, are negligible and these games also allow for what Europol define as “an emerging type of entrepreneurial partnerships between different OCGs [Organised Crime Groups] operating in different countries and even continents. One criminal group would take care of planning, organising and executing the match-fixing schemes in one Member State (sometimes even involving both teams in e.g., football-related cases), while foreign financiers would finance or co-finance the match-fixing operation.”¹¹⁶ This model perfectly fits the training camp model, where outside agents fund training camps that have no discernible opportunity for commercial exploitation other than match manipulation.

Clubs that struggle to pay players on time are attending overseas training camps that cost €20,000 and often more. For OCGs, covering the cost of a camp that includes matches to be manipulated is a proven business model. In the Travnik example, the OCG ‘invested’ €80,000 to cover the cost of the training camp and made €317,000 from fixing three matches. A similar example can be found in the Nitra case and was behind concerns at the Malta Football Association over proposals put forward by clubs in Malta to take part in training camps, including one club going abroad with all expenses paid to play two matches. Maltese club Hamrun Spartans were banned from participation in the 2021/22 UEFA Champions League over a match-fixing case that dated back to 2013, when two former officials admitted fixing.¹¹⁷ This manipulation occurred during a season that began when unidentified Bulgarian investors took the club to a training camp in Bansko.¹¹⁸ “The friendly matches are

the easiest way to make money,” commented former Malta Football Association integrity officer Franz Tabone.¹¹⁹

While drivers behind the majority of match-fixing in most club football are sporting and tied to league positions, prize money or European qualification, this does not apply to club friendlies. Money laundering cannot be discounted and anecdotal stories exist of clubs being paid to lose matches to opponents from well-funded but weaker clubs outside of Europe. However, the main reason to manipulate a friendly match is betting related. This is only primarily possible if the matches are available on the highly liquid Asian betting markets, which Europol says have “the most remarkable advantage of ensuring a high degree of anonymity,”¹²⁰ and this view is widely accepted elsewhere.

“The scale of illegal betting markets in Asia, with huge liquidity that offers good returns, is such that organised crime groups in Europe as well as Asia make use of this network. In addition, the multiple layers of the Asian betting markets based on a pyramidal structure of bookmakers, super master agents, master agents and basic agents, each level providing credit to the next level down, provide cut-outs and anonymity for customers.”

Martin Purbrick, Asian Racing Federation’s council on anti-illegal betting & related financial crime. ¹²¹

Betting companies can look to protect themselves by limiting the size of bets, but the nature of this system makes this easier for fixers to get bet small amounts on multiple occasions. This is typically poorly or unregulated operators, especially those with higher liquidity and using the agent system and anonymous bets in Asia, but less so in more rigorously regulated environments in Europe. Marco Blume adds: “There are limits on friendlies of between \$250 and \$1,000, but customers can bet 30 times from one account and these guys probably have 30 accounts too. Depending on the sophistication, you can bet \$50 hundreds of times.”

¹¹⁵ To fix or not to fix? How corruptors decide to fix football matches. Hill, Declan. Global Crime. Vol. 10, No. 3, August 2009, p157–177

¹¹⁶ The involvement of organised crime groups in sports corruption: Situation Report (Europol 2020), p11

¹¹⁷ <https://timesofmalta.com/articles/view/uefa-turn-down-hamrun-spartans-appeal-to-compete-in-2021-22-champions.877958>

¹¹⁸ <https://timesofmalta.com/articles/view/Spartans-for-training-camp-in-Bulgaria.428515>

¹¹⁹ Interview 27/11/20

¹²⁰ Europol, p14

¹²¹ ‘Asian organised crime groups behind illegal betting have Europe in their sights’ Racing Post, 2/3/21

Match fixers have a clear understanding of how to manipulate this system from the scheduling of fixtures through to attracting data scouts and exploiting the betting market. For competitive matches, fixture lists are easily accessible, but for lower level clubs, these games are not always so easily identifiable. Publishing regular updates on Twitter can attract betting, but match fixers that seek to manipulate a friendly will publicise these games in advance on social media to attract data companies and then stream fixtures live on the Internet to increase the chances of these games appearing on betting markets.

"They will play games on a Saturday or Sunday morning, or a Wednesday for Asia, so there is no clash with other leagues. Or a Friday when there are no other games and many people will bet as there are no other games. In friendlies, they will prepare the players and the referees to fix. They will get a signal from the bench or behind the net or the corner to say the game is on the markets. The fixers are just waiting to see if it's on the markets."

Associate of match-fixing group¹²²

Again, the trend is less recognised at a European level, but Sport Integrity Australia has also noted:

"In some cases, betting is only available on a competition or event because data-scouts are able to collect and transmit relevant data and statistics for the use of offshore bookies. The creation of these offshore markets increases the integrity risk to Australian sport and its participants."

When friendly games are not being offered, fixtures are stopped. During their preseason training camp of Switzerland, NK Travnik also played Young Boys Berne and FC Schaffhausen. No attempts at manipulation were made as the games were not on Asian markets, but the culprits later admitted to police that subsequent friendly matches were fixed in other countries due to their inherent vulnerability.

Betting companies will continue to offer club

friendlies in Europe during midwinter breaks and the offseason, and the increasingly low level nature of these games being targeted for live coverage by data companies simply encourages betting companies to offer a market, even if it is for no other reason than to negate a perceived commercial advantage of a competitor's product offering. Once one betting company has offered a fixture, other operators will follow suit for fear of losing market share. Sam Gomersall, sports integrity manager at Pinnacle, explains:

*"It's an arms race between sports books. If one company puts a match up then two or three follow, then the odds company websites and no-one knows where these fixtures come from."*¹²⁴

If data companies do not send scouts to low-level club friendlies, or scrape data from livestreams of these games, betting companies cannot offer in-play betting and there would be no opportunity for match fixers to profit from any manipulation. The Swedish football federation had an open register of friendlies which had to be closed in the summer of 2020 as data companies accessed these fixtures and offered live feeds on the lowest level amateur games, some of which included teenagers. Jakob Uddeholt, integrity officer at the Swedish Sports Confederation, explains:

*"Data providers also have a responsibility. They are part of the solution, but also part of the problem."*¹²⁵

However, whilst increasingly essential for the facilitation of in-play betting, data providers do not fall under a regulatory framework and oversight as well-regulated betting operators in the jurisdictions covered by this study. Whilst it is acknowledged that some data providers offer additional services such as trading operations, which may be licensed and regulated, the separate collation and sale of sporting event data has no comparable regulation; there nearest thing to regulation is the IBIA data standards framework. Sporting event data collation and sale for betting therefore does not currently fall within the scope of regulation, leaving a potential 'blind spot' in terms of market and consumer protection.

¹²² Name withheld by agreement.

¹²³ Data Scouts at Australian Sporting Events. Sport Integrity Australia (2021)

¹²⁴ Interview 30/4/20

¹²⁵ Interview 3/4/2020

There is also a potential inherent contradiction in the commercialisation of sports data for betting. Data companies agree contracts with sports associations or event organisers (or sometimes take this data without agreement) to commercialise data from sporting events. They then either separately, or as part of these agreements, also offer to monitor games for suspicious betting, which this data sale may facilitate or encourage. There is a clear potential conflict in this commercial activity and where parties that provide integrity services are also reportedly selling sporting event data - either directly or indirectly via third parties - to poorly regulated or unregulated bookmakers that are not required to monitor or report suspicious betting activity.¹²⁶

This clearly heightens the integrity risk (see Figure 19). Such poorly or unregulated betting operators, notably based in Asia, are deemed by international law enforcement to be the main conduit for corrupters to place bets.^{127 128 129} It is important to note that, while sporting event data is being reported by some companies as only being sold to operators that are 'licensed', licensing does not mean well-regulated. These are separate activities. It is important that football governance and integrity authorities, clubs and friendly tournament organisers recognise this when considering the scope and nature of data company access and the associated sale of sporting event data.

The potential conflicts of offering competing services in relation to commercial sporting event data sales and maintaining event integrity has been recognised by the Asian Racing Federation, which in October 2020 stated that:

*"The leading commercial monitoring organisations offer other additional services to betting operators such as trading solutions and sportsbook management, as well as selling media rights on behalf of sports. These additional services provided to betting operators and sports could be viewed as a potential conflict of interest. Commercial bet monitoring organisations are not regulated."*¹³⁰

The Alcohol & Gaming Commission of Ontario in Canada has moved to try and address any potential conflicts from commercial data

services and trading platforms, which are also involved in integrity monitoring, by establishing a regulatory integrity monitoring and reporting system where: "Independent integrity monitors shall not have any perceived or real conflicts of interests in performing the independent integrity monitor role, including such as acting as an operator or as an oddsmaker."¹³¹

Sports bodies also need to take greater responsibility for regulation of these matches and make strategic decisions that make exploitation of these games more difficult for match fixers. In tennis, for example, a clear integrity threat was identified in the lower tiers and after a three-year inquiry considered how best to address this, the response was to discontinue the supply of official live scoring data and to remove matches more susceptible to corruption from in-play betting markets globally.¹³²

Action is needed to address the dangers that unregulated club football friendly matches pose to the integrity of the game and the sport's regulators and organisers should not be deterred by the additional burden of work that would be created by improving governance in this area across Europe. Instead, the footballing authorities have an opportunity to set an example that others can follow.

"I have the impression that if you want to fix matches, you go the way of least resistance. Our system is quite bureaucratic. The burden is on the organisers. It's very formal. If you want to stop fixing, then you need to implement a system and that costs time and money. In the summer, I have two people released from their normal duties just to do this. For the middle and small sized federations, we do not have unlimited resources. For the federation in Austria, it's a strategic decision."

Thomas Hollerer, general secretary, ÖFB. ¹³³

The solution to reduce match fixing in club friendly matches must be a holistic one that involves all stakeholders within the football sector taking greater responsibility and not seeking to lay the blame elsewhere. This starts from the point that in terms of integrity, friendlies should be treated the same as competition matches.

¹²⁶ <https://www.smh.com.au/sport/basketball/gobsmacking-national-basketball-in-league-with-illegal-betting-sites-offshore-20210325-p57e6x.html>

¹²⁷ <https://www.europol.europa.eu/newsroom/news/update-results-largest-football-match-fixing-investigation-in-europe>

¹²⁸ The involvement of organised crime groups in sports corruption: Situation Report (Europol, 2019)

¹²⁹ Match-fixing in Football: Training Needs Assessment (Interpol, 2013)

¹³⁰ Good Practices in Addressing Illegal Betting: A Handbook for Horse Racing and Other Sports to Uphold Integrity (ARF, October 2020), p52.

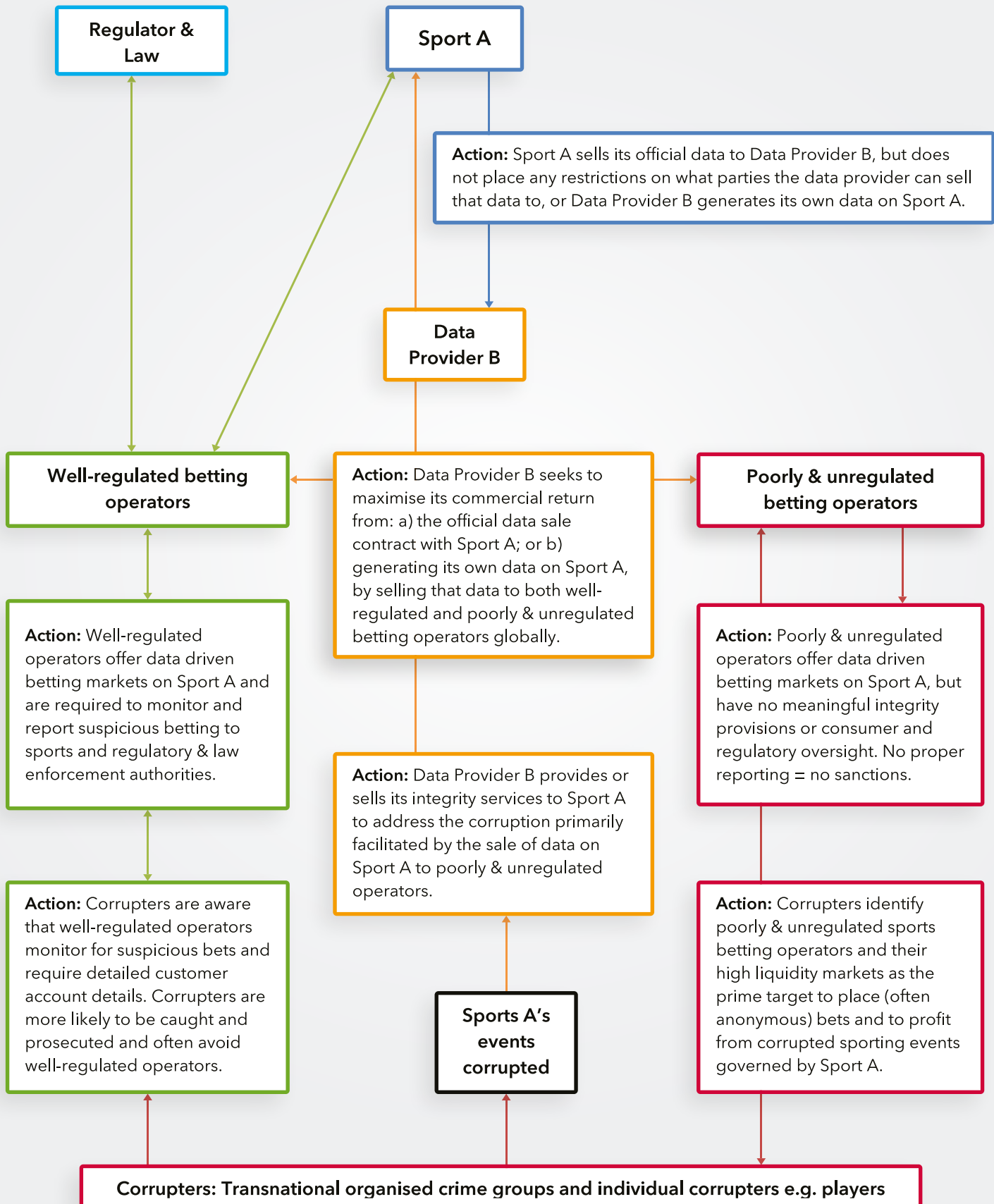
¹³¹ <https://www.agco.ca/sport-and-event-betting-integrity>

¹³² Independent Review of Integrity in Tennis (December 2018)

¹³³ Interview 18/2/2019

Fig 19. Market mechanics: how sports data can facilitate poorly or unregulated betting and corruption

Market mechanics: how sports data can facilitate poorly or unregulated betting and corruption



RECOMMENDATIONS

The following recommendations are set out to improve the governance of club football friendlies and make the corruption of these games more difficult for match-fixers.

- Greater awareness amongst players that fixing a friendly is still fixing and the wider encouragement amongst players to use the FIFPRO Red Button to report incidents or suspicions of manipulation, particularly in training camps played abroad.
- National Platforms to individually ascertain whether their domestic laws – both sporting and judicial – allow for the punishment of manipulation of friendly matches. If matches are not considered official and players do not receive compensation (as is the case with some friendlies), then manipulation may not be punishable under panel law.
- Clubs should be educated to understand that sharing event information on social media and streaming matches live from training camps or other friendly matches will allow data companies to access that data, which may then be sold to betting operators around the world to generate betting markets on those matches. Playing games in publicly accessible venues may also allow data scouts access to those games and consequently betting markets. Clubs should be aware of potential issues arising from this.
- UEFA to enforce regulation of all friendlies on all 55 members. This regulation would include details of all matches, including players, match officials and match agents and, where applicable, the involvement of outside sponsors. The Austria model offers a potential example with small charge levied per game to cover costs of this regulation.
- Formation of a body to represent match agents and recognition by FIFA and continental confederations to collaborate on future regulation of friendly matches.¹³⁴
- Data standards to be updated and strengthened regularly and be promoted by sporting bodies. This could include sports bodies only agreeing contracts with companies that sign up to data standards and inclusion of clauses to prevent the sale of data by these companies to unlicensed and unregulated or poorly licensed and regulated operators, which do not pass on incidents of suspicious betting to counter the impact of these companies failing to report incidents of suspicious betting.
- To improve transparency and reduce the opportunity for manipulation, match agents should not be allowed to own clubs, just as players agents are also barred from owning clubs.

¹³⁴ The Federation International de FIFA Match Agents (FIFMA) claims to represent match agents but has had no contact with FIFA and did not respond to multiple attempts to make contact by this project. <http://fifma.net/en/index.php>



APPENDICES

METHODOLOGY

Aim of the project

The aim of the project is to understand the extent of match-fixing in non-competitive club friendlies in Europe in the period 2015 to 2021 - why this happens - and what policies and strategies can be developed to deter this phenomenon.

Methodology

The project included four stages: research, investigation, draft report and final output. The research focused on the impact on industry stakeholders of the fixing of friendly matches. It primarily covered three main regional locations within the European Union and partner countries, where the issue investigated is particularly present:

- a) Iberia, comprising Spain and Portugal
- b) The Mediterranean, comprising Cyprus, Greece and Malta
- c) Eastern Europe, comprising Czech Republic, Romania, Slovenia and the Ukraine¹

The research design was developed to ensure the gathering of both quantitative (i.e., questionnaires) and qualitative (fieldwork, interviews) data. It was developed jointly by the consortium's academic partners, P1 the University of Nicosia Research Foundation and P3 CIES. The sound development of project was intended to be implemented through a structure of biannual meetings, supported by shorter interim meetings on a remote basis.²

Research

Literature Review

Background reading for the project ranged from academic journal articles to outputs from previous Erasmus projects, regulations from continental and international federations to industry reports from relevant stakeholders (see reference list at the end of the report). This was carried out using library visits, online databases such as Sports Discus and visits to industry stakeholders and participants, such as betting companies, to fully understand their working

processes and guidelines.

The lead researcher delivered a summarised body of work to the project partners and used it to support the analysis and feedback session in meeting 2 in Nicosia, Cyprus, on October 24, 2019.

Deliverables

The outcome from this stage, allied to the results of meeting one produced a key deliverable in the ratification of the research methodology, guidelines and framework for the research. This was necessary before any investigatory work could commence and quality control was ensured through regular contact with the project manager at P1 University of Nicosia Research Foundation and supervision from P3 CIES.

Investigation stage

The objective in the investigation stage was for the researchers to make trips to interview stakeholders, attend NCM matches and training camps and gather evidence.

- Implementation

Between partner meetings, research trips were carried out by the project coordinator and the subcontractor. However, in the second year, the outbreak of COVID-19 disrupted this approach and more research and meetings had to be undertaken on a remote basis.

The methodology was developed further at the first project partner meeting in Brussels in March 2019 and a mixed approach (qualitative and quantitative) was definitively adopted for the research to gather as much information from as wide a range of sources as possible.

- Meetings and interviews

The lead researchers visited betting companies, governing bodies and other stakeholders. Working with FIFPRO, research was carried out to gauge experiences of fixing in friendly games amongst stakeholders and target groups, at a public and private level and time spent within the integrity departments of betting operators.

A total of 90 interviews where the interviewee can be identified were conducted throughout the course of the project. Further interviews were conducted under the condition of

¹ Bulgaria was in the initial project proposal but replaced by the Czech Republic during the research stage due to an increase in the number of NCMs in that country.

² This original schedule was disrupted by the outbreak of COVID-19 and restrictions on travel. From March 2020 until December 2021, meetings had to be conducted virtually.

anonymity. These were either face-to-face during research trips or by audio or video call. Field research trips were carried out to interview stakeholders, in the following countries: Austria, Belgium, Cyprus, the Czech Republic, Greece, London, Malta, the Netherlands, Portugal, San Marino, Slovakia, Spain, and Switzerland (twice)

Due to the COVID-19 outbreak, research trips to Greece and Slovenia that had been booked were delayed. Further research trips scheduled for the project including visits to Romania and the Ukraine also proved impossible as a result of travel restrictions due to COVID-19. The consequence of these travel restrictions was a lack of face-to-face interviews, but this was overcome by virtual meetings.

Related conferences that were attended in person included:

- ICE 2019 (London, UK)
- Play the Game 2019 (Colorado, USA)
- 2020 Perform Integrity Event (London, UK)
- 2021 Leaders in Sport (London, UK)
- 2021 Betting On Sports Europe (London, UK)

Virtual conferences attended included:

- Betting On Sports Europe (October 2020)
- Suspicious Betting Trends in Global Football 2020 Report (August 2020)
- iGB's Managing Betting Integrity Risks Using Data, Tech & Intelligence webinar (October 2020)
- Asian Racing Federation's Good Practices in Addressing Illegal Betting webinar (January 2021).
- Bank of Sweden webinar on match-fixing (June 2021)

The project also used questionnaires to understand the views of stakeholders conducted by project partners.

- Football Players' survey

A survey of players and their experiences with match-fixing in friendlies in Cyprus, Greece and Malta was conducted by the respective

player unions: P2 the Pancyprrian Footballers Association (PASP), P6 the Panhellenic Professional Football Players union (PSAP) and P7 the Malta Football Players Association (MFPA) with guidance from P5 EU Athletes. The questionnaire and full results are in the appendices (Appendix 1)

- Further research to support evidence

A questionnaire was devised to access the information on the number of friendlies offered by the International Betting Integrity Association's members. Another survey was carried out to understand regulations on the offering of bets on friendly matches by European betting regulators. A survey was also conducted with sports data companies. The responses to this questionnaire were anonymized by agreement with those companies who accepted to reply.

To support the evidence gathered through the player survey, the project also built up a database of suspicious club friendly matches played between 2016 and 2020. Indicators for these matches were gathered from players, player unions, betting monitoring associations and companies, bookmakers and individual analysts. This database was developed to understand which countries host more suspicious friendlies, which clubs are involved more and what times of the year and day are more likely to feature these games.

In order to develop recommendations that were realistic and achievable, the project also sought to understand the regulations surrounding the staging of club friendly at a national, continental, and international level and how these are implemented.

Dissemination

A conference paper was delivered at the Play the Game 2019 conference (Colorado, USA) and a webinar on preliminary findings was given in September 2020 to more than 90 representatives from local enforcement agencies around the world, which was hosted by INTERPOL. An article was also published on the sports governance website Play the Game in May 2020 and shared widely via social media by the project partners.³ The aim of this early dissemination was to generate peer feedback during the evolution of the project.

³ This article was shortlisted for the best column category in the 2021 AIPS Sports Media Awards

Draft report

A draft report was written with supervision from P3 CIES and circulated to all project partners in the spring of 2021. The contents and comments generated from this draft report were then discussed at the fifth transnational meeting online in May 2021 and amendments agreed and finalised. At this meeting and following the research and investigation stage, educational materials developed by P2 PASP, P5 EU Athletes, P6 PSAP and P7 MFPA for dissemination amongst players, warning of the dangers of match-fixing in friendlies.

Final Report

Following the comments and amendments proposed at the fifth transnational meeting, a final version of the stakeholders' report and the educational materials were produced and ratified by the project team at an interim meeting held online in October 2021.

The educational materials were disseminated by project partners P2 PASP, P6 PSAP and P7 MFPA at multiplier events for players and other stakeholders in Cyprus, Greece and Malta and also used for education and guidance by P5 EU Athletes.

Final dissemination of the stakeholders' report was carried out at an integrity day co-organised and hosted by FIFPRO (the parent organisation of P2 PASP, P6 PSAP and P7 MFPA) in Amsterdam, in the Netherlands, in December 2021.

DELIVERABLES

Research stage & investigation stages

- As part of this stage of the project, a number of surveys of key stakeholders. A survey of nearly 700 players who were members of the P2 the Pancyprrian Footballers Association (PASP), P6 the Panhellenic Professional Football Players union (PSAP) and P7 the Malta Football Players Association (MFPA). The questionnaire and full results of this survey can be found in appendix 1.
- A survey of the 55 members of UEFA was conducted to understand their rules for regulating and governing club football friendlies. The survey questions can be found in appendix 2 and the results in the chapter on Current National, International

and Global Regulation.

- A database of suspicious matches was compiled using various sources. The results can be found in the chapter, Suspicious Friendly Matches.
- A questionnaire was devised to access the information on the number of friendlies offered by the International Betting Integrity Association's members. The survey questions can be found in appendix 8 and the results in the chapter on the Role of Betting Operators and European Betting Regulation.
- Another survey was carried out to understand regulations on the offering of bets on friendly matches by European betting regulations. The survey questions can be found in appendix 9 and the results in the chapter on the Role of Betting Operators and European Betting Regulation.
- A survey was also conducted with sports data companies. The responses to this questionnaire were anonymized by agreement with those companies who accepted to reply. The survey questions can be found in appendix 10 and the results in the chapter on the Role of Data Providers.
- As part of the investigation stage, intelligence reports compiled after interviews and research trips were written on incidences of suspicious friendlies involving Ventspils (appendix 6) and Panachaiki (appendix 7).

Report stage

A draft copy of the report was circulated to all project partners before the transnational meeting on May 13/14. This meeting had to be held online due to travel restrictions caused by the COVIDS-19 pandemic.

- Draft educational materials including posters, flyers and a video, all warning players of the dangers of match-fixing in club friendlies were also produced for the online transnational meeting on May 13/14.
- Subsequent drafts of the report and educational materials were produced for interim project meeting held on August 24 and final versions agreed at another online interim meeting on October 20.

GENUINE & ADEQUATE NEEDS ANALYSIS

The staging of friendly football matches by individuals and private organisations has flourished as an industry in the last 10-15 years. However, the problem of fixing and the dangers it poses have never before been the subject of serious academic study. There is little or no serious regulation or governance of friendlies by private or public stakeholders. Yet, these games are increasingly offered on regulated and unregulated betting markets both inside and outside the EU.

The globalisation of pre-and mid-season friendlies is increasing, particularly cross-border games played between lower profile clubs in many European countries. Data from these games is collated by data companies and supplied to betting operators around the world operating under varying levels of regulation. This allows them to generate markets on those events that typically attract less scrutiny from football governance bodies and are therefore easier to manipulate than high profile exhibition matches.

This research aims to produce meaningful and positive policy impact by informing how private actors (the football stakeholders) and public actors (national and European level policymakers) approach the regulation of non-competitive matches (NCMs) played before and during the football season and how to combat match-fixing in these games.

The project has promoted dialogue between key stakeholders and actors with a view to promoting better understanding of the issue, sharing best practice, encouraging a culture of good governance within sports bodies, and benefiting the continuing development of advanced security protocols within licensed and well-regulated betting operators to detect potentially corrupt activity in friendlies.

Match-fixing is a cross border global issue and cannot be addressed in isolation. Coordinated international action is necessary and the EU has been at the forefront of this. Numerous reports and studies, including European Commission documents and the Council of Europe's Convention on the Manipulation of Sports Competitions, which

the Commission supports, endorse the need for transnational action.⁴

This project and its evidence-based outcomes support the promotion of best practice international dialogue and the protection of sport, sporting events and the important societal role of the sector which is a key feature of EU sports policy as articulated by Article 165(2) TFEU and as stated in successive EU policy documents on sport including its Communication on Sport, the Green Paper on Online Gambling and the Communication "Towards a comprehensive European framework on online gambling", which identifies match-fixing as one of five priorities for addressing the challenges facing the integrity of sport.⁵ This will also benefit the protection of well-regulated betting operators, their consumers and regulated betting markets across the EU, and indeed globally.

Relevance of the Project

Match-fixing is a cross border global issue and a multi-jurisdiction collaborative partnership and synergies should be fostered at a local and regional level to tackle the problem. This project has assisted the co-operation between key academia and non-academic partners in the form of players, clubs, unions and national associations.

Understanding the extent of match-fixing in club football friendlies and proposing solutions is relevant to each of the participating organisations. Education and protection of players from match-fixing is an ongoing key objective for the integrity of the sport and for the international players union (FIFPRO) specifically. This need was addressed in this project by the inclusion of P5 EU Athletes as a pan-European athletes' body. P5 EU Athletes is a recognized stakeholder at the European sport sector and made the fight against match-fixing one of its priorities since 2016, while repeating this commitment in 2018.⁶⁷

P1 University of Nicosia Research Foundation and P2 the Pancyprian Footballers Association are both based in Cyprus, which has experienced endemic problems with match fixing in all forms of football, including friendly-focused training camps involving clubs from other countries coming to the island. By way of example, a match

⁴ <https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/215>

⁵ <https://sport.ec.europa.eu/policies/sport-and-integrity/fighting-match-fixing>

⁶ <https://euathletes.org/wp-content/uploads/2017/05/EU-Athletes-Common-Position-Paper-min.pdf>

⁷ https://euathletes.org/wp-content/uploads/2019/04/EUA_COMMON_POS_2018_FICHES.pdf

fixing ring exposed involving fake referees at training camps was exposed in 2018.⁸

Greece has also experienced severe problems with match-fixing,⁹ in particular the so-called Koriopolis scandal that affected many parts of Greek football, and this justified the inclusion of P6 the Panhellenic Professional Football Players union (PSAP) in the project. Malta has also experienced repeated problems with match-fixing.¹⁰ This made the project relevant to Malta and fostered the inclusion of P7 the Malta Football Players Association (MFPA).

As much of the problem being researched is betting related, it was pertinent to P4 The International Betting Integrity Association (formerly the European Sports Security Association, or ESSA), whose members include many of the largest regulated sports betting operators in the world and which operates the largest customer account-based monitoring system covering \$137bn in turnover globally in 2019. To ensure that the project was conducted and supervised with academic rigour, P3

Centre International d'Etude du Sport (CIES) was included in the project team.

This project team, along with the inclusion of subcontractor Sports Integrity Services (SIS), which was included to aid the investigatory element, gave the project a wide-ranging array of inputs that could address the key target areas including educating players and identifying the weaknesses in existing governance that allow match-fixing in friendly matches.

The project and report addresses these needs by researching and investigating the level of the problem, recommending governance and organisational solutions at a pan-European level and educational tools for key targets, notably players, clubs, and national associations. Hopefully, the project will also benefit other sports at a Pan European level as the findings and solutions developed for football have significant areas in common with other sports.

⁸ <https://theblacksea.eu/stories/football-leaks/cypriot-deception/>

⁹ <https://www.newsweek.com/greece-charges-41-over-match-fixing-football-scandal-deepens-327763>

¹⁰ Match-fixing: the case of Malta. Aquilina, Dawn and Chetcuti, Angelo. *International Journal of Sport Policy and Politics*. Volume 6, 2014 - Issue 1

APPENDIX 1.



**Combating Match Fixing
in Club Football
Non-Competitive Matches**

Football Players Survey Findings



Co-funded by the
Erasmus+ Programme
of the European Union



UNIVERSITY of NICOSIA
RESEARCH FOUNDATION



1. THE SURVEY

1.1 Objective of the Survey:

The survey's main purpose was to investigate whether the football players were ever approached to fix a match in both Non-Competitive Matches (NCMs), referred to here as friendlies, and official games. The survey also aimed to investigate players' as to who might be involved in match fixing, especially in non-official matches.

1.2 Contributors:

The survey was conducted by the three football associations who are partners in this project: P2 the Pancyprian Footballers Association (PASP), P6 the Panhellenic Professional Football Players union (PSAP) and P7 the Malta Football Players Association (MFPA).

1.3 Period:

Second half of 2019. The survey was distributed at the start of the 2019/20 season, when visits by player unions to clubs and contact with players during August and September is commonplace.

1.4 Methodology:

1.4a Method:

The survey was based on a common questionnaire which was translated by the partners from English into the national language of each of the three associations. In the case of non-native football players, the questionnaire was completed in English.

In Cyprus and Greece, the questionnaires were handed out to players at first and second division clubs during locker room visits, when player unions have direct and more discreet access to players and players followed the self-completion method.

In Malta, the MPFA used its database to email all active male players about the aims of the survey, which was made available online in August and September. During August, the MPFA has regular visits from player members about issues such as contracts or payment issues. These players were asked if they had completed the survey and if not sent a link on their mobile phone.

1.4b. Sample: Football players from the top three divisions in each country (Cyprus, Greece, Malta)

SAMPLE SIZE		
COUNTRY	FREQUENCY	PERCENT %
Cyprus	459	66.1
Greece	121	17.5
Malta	114	16.4
Total	694	100

1.4c. Method of Data analysis:

The method used was descriptive statistics and involved SPSS software. Respondents had the right not to answer one or more questions if they chose not to. As a consequence, some questions have smaller number of total responses compared to the general sample. The percentages shown are only of those who replied to the question and not of the total number of participants.

2. SAMPLE DEMOGRAPHICS

2.1 Age Distribution

All	Frequency	Percent
Under 18	31	4.5
18-22	223	32.1
23-26	166	23.9
27-30	147	21.2
Over 30	127	18.3
Total	694	100

The majority of the respondents were between 18-30 years old and the biggest percentage of respondents were aged between 18-22 years. In Cyprus, the largest number of respondents were aged between 18-22 years, while in Greece and Malta, the biggest sample came from the 23-26 age group.

Cyprus Sample

Cyprus	Frequency	Percent
Under 18	28	6.1
18-22	168	36.6
23-26	90	19.6
27-30	98	21.4
Over 30	75	16.3
Total	459	100

Greece sample

Greece	Frequency	Percent
Under 18	1	1
18-22	33	27.3
23-26	40	33.1
27-30	27	22.3
Over 30	20	16.5
Total	121	100

Maltese sample

Malta	Frequency	Percent
Under 18	2	1.8
18-22	22	19.3
23-26	36	31.6
27-30	22	19.3
Over 30	32	28.1
Total	114	100

2.2 Gender

The survey only included male players.

GENDER	CYPRUS	GREECE	MALTA
Male	456	121	114
Female	0	-	-
Total	456	121	114

2.3 Professional or semi-professional

In all three countries, the vast majority of the respondents were professional players (75%). In Greece, all the players surveyed are professionals, while this was the case for only 13.2% of players who participated in the survey in Malta. Footballers playing in the Maltese leagues typically have other jobs in addition to playing football.

All	Frequency	Percentage	Cyprus	Frequency	Percentage
Professional	516	75.00	Professional	380	82.8
Semi-Professional	172	25.00	Semi-Professional	73	15.9
Total	688	99.1	Total	453	98.7

Greece	Frequency	Percentage
Professional	121	100
Total	121	100

Malta	Frequency	Percentage
Professional	15	86.8
Semi-Professional	99	13.2
Total	114	100

2.4 Divisions: At what level are currently playing?

The majority of historic match-fixing incidents in all three countries involved clubs outside of the elite. The majority of the football players in the survey sample played in the second division. In Cyprus and Greece, 61.1% and 50.4% of respondents respectively played in the second league but in Malta, 36% play in the first division and 33.3% in the second division.

	ALL		CYPRUS		GREECE		MALTA	
	Freq	%	Freq	%	Freq	%	Freq	%
Top Division	242	34.9	174	38	30	24.8	38	33.3
Second division	356	51.4	280	61.1	61	50.4	15	13.2
Third Division	53	7.6	3	0.7	30	24.8	20	17.5
Top and Second Division	1	0.1	1	0.2	-	-	-	-
First division	41	5.9	-	-	-	-	41	36.0
Total	693	100	458	100	121	100	114	100

2.5 Country of Origin

Are you from the country of the league you are currently playing in?

Around 70% of the respondents said that they came from the country where they were playing football at the time the survey was conducted: from 61.8% in Cyprus up to 92.0% in Malta.

	ALL		CYPRUS		GREECE		MALTA	
	Freq	%	Freq	%	Freq	%	Freq	%
Yes	470	68.2	281	61.8	85	70.2	104	92.0
No	219	31.8	174	38.2	36	29.8	9	8.0
Total	689	99.4	455	100	121	100	113	100

3. FINDINGS

3.1 Participation in games that the respondents knew they were fixed

3.1a. Have you played in a friendly match that you knew was fixed?

Only 13.5% of the respondents said that they have played in a friendly match that they knew was fixed. The lowest percentage was in Malta (5.6%) and the highest in Greece with almost 20%, followed by Cyprus with almost 14%.

	ALL		CYPRUS		GREECE		MALTA	
	Freq	%	Freq	%	Freq	%	Freq	%
Yes	93	13.5	63	13.9	24	19.8	6	5.2
No	596	86.5	391	86.1	97	80.2	108	94.8
Total	689	100	454	100	121	100	114	100

3.1b. Where was the game played?

Out of the 24 football players in Cyprus having played in a friendly match they knew was fixed, 23 (96%) said that the latter was played in Cyprus, and one respondent said the game was played in Greece.

From the Greek sample, four players (20%) said that the match was played in Cyprus, 13 respondents (65%) said that the match was played in Greece and three players (15%) referred to incidents in Malta.

All the players in Malta to answer this question said that the fixed friendly match was played in Malta.

In total, 55.1% of the known fixed matches were played in Cyprus, 28.6% in Greece and 16.3% in Malta. This in part reflects a larger sample of respondents from Cyprus.

Match Played in	ALL		CYPRUS		GREECE		MALTA	
	Freq	%	Freq	%	Freq	%	Freq	%
Cyprus	27	55.1	23	95.8	4	20	-	-
Greece	14	28.6	1	4.2	13	65	-	-
Malta	8	16.3	-	-	3	15	5	-
Total	49	100	24	100	20	100	8	100

3.1c. Have you played in an official game in the country you are now playing in that you knew was fixed?

The results on official games have a higher percentage of positive responses than the friendly ones, which reflects the larger number of official games that players take part in compared to friendly matches. The results showed that 21.3% (146) respondents said that they had played in an official game that they knew was fixed. The highest percentage was recorded in Malta (27.2%), followed by 20.6% in Cyprus and 18.2% in Greece.

	ALL		CYPRUS		GREECE		MALTA	
	Freq	%	Freq	%	Freq	%	Freq	%
Yes	146	21.3	93	20.6	22	18.2	31	27.2
No	541	78.7	359	78.2	99	81.8	83	82.8
Total	687	100	452	98.5	121	100	114	100

3.2 Participation in suspected fixed games

3.2a. Have you ever suspected that a friendly game in which you participated was fixed?

There was a significant difference between the number of respondents who had played in a friendly they knew was fixed compared to those who suspected they had taken part in a manipulated friendly. More than a quarter of the respondents (26.5%, 184 players) said that they suspected that a friendly game they participated in was fixed. This compares to 13.5% (93 players) who said that they had played in a game they knew that it was fixed (see 3.1.a.). The highest percentage of positive respondents to this question came from Greece (35.5%), followed by Cyprus (25.3%) and Malta (21.9%).

	ALL		CYPRUS		GREECE		MALTA	
	Freq	%	Freq	%	Freq	%	Freq	%
Yes	184	26.5	116	25.3	43	35.5	25	21.9
No	510	73.5	343	74.7	78	44.5	89	78.1
Total	694	100	459	100	121	100	114	100

3.2b. Have you ever suspected that an official game in which you participated was fixed?

In common with the responses for friendly matches, the number of respondents who said that they had played in an official game they knew that it was fixed was significantly higher with 292 positive responses compared to 146. The total percentage is quite high at 42.2%. Per country, the proportions vary from 81.6% of respondents who play football in Malta having suspected they had played in a fixed game to 49.6% in Greece and 30.4% in Cyprus.

	ALL		CYPRUS		GREECE		MALTA	
	Freq	%	Freq	%	Freq	%	Freq	%
Yes	292	42.2	139	30.4	60	49.6	93	81.6
No	400	57.8	318	69.6	61	50.4	21	18.4
Total	692	99.7	457	100	121	100	114	100

3.3 Approach

3.3a. Have you been approached at any time to fix a friendly game or any part of it?

The proportion of players who had been approached to fix a friendly match is 16.5%, with a greater percentages of approaches to fix friendlies to players in Greece (23.3%), compared to 16.4% for Cyprus and 9.6% in Malta.

	ALL		CYPRUS		GREECE		MALTA	
	Freq	%	Freq	%	Freq	%	Freq	%
Yes	114	16.5	45	9.9	28	23.3	11	9.6
No	578	83.5	411	90.1	92	76.7	103	90.4
Total	692	100	458	100	120	100	114	100

3.3b. Where were you approached?

Almost 40% of the players who answered this question were approached in the dressing rooms: from 37% in Cyprus and Malta, up to 46.4% in Greece. Almost 20% of the respondents replied that they were approached in other places, the highest percentage being in Malta (36.4%). Many players anecdotally report being approached on social media, such as Facebook, or via encrypted messaging services such as What's App or Messenger.

	ALL		CYPRUS		GREECE		MALTA	
	Freq	%	Freq	%	Freq	%	Freq	%
Dressing room	45	39.5	28	37.3	13	46.4	4	36.4
Elsewhere in the stadium	5	4.4	4	5.3	-	-	1	9.1
Training ground	6	5.3	3	4	2	7.1	1	9.1
Hotel	7	6.1	5	6.7	2	7.1	-	-
Own home	6	5.3	5	6.7	-	-	1	9.1
Other	22	19.3	15	20	3	10.7	4	36.4
N/A	12	10.5	11	14.7	1	3.6	-	-
Combination*	11	9.6	4	5.3	7	25.1	-	-
Total	117	18.3	75	16.3	27	22.3	11	100

3.3c. Have you been approached at any time to fix an official game or any part of it?

Almost 20% of the 663 players who answered this question said that they were approached to fix an official game or part of it. The highest percentage was recorded in Greece (45.5%), followed by Malta (23.9%) and Cyprus (11.2%).

	ALL		CYPRUS		GREECE		MALTA	
	Freq	%	Freq	%	Freq	%	Freq	%
Yes	130	19.6	48	11.2	55	45.5	27	23.9
No	533	80.4	381	88.8	66	54.5	86	76.1
Total	663	100	429	100	121	100	113	100

3.4 Instigators:

3.4a. If you have played friendly games that were fixed or you suspect were fixed, who in your opinion were the main instigator(s) of the fix? *

Out of those respondents to be confronted with this issue, 146 (19%) believe that the main instigators were club officials. The highest percentages were recorded in Malta and Cyprus (around 20.5%), while the proportion of players identifying club officials as the main instigators was 15.9% in Greece.

The survey also showed found that 14.8% of respondents believe that the instigators were football players. In Malta and Greece, 18% of players confronted with this issue believed players to be the main instigators, compared to 12% in Cyprus.

Of those respondents who play in Cyprus, 11.4% believed that the referees or match officials were the main instigators of the fix. This percentage is greater than in Greece (8.7%) and even more so than in Malta (2.1%).

The highest percentage for match organisers or match agents as the main instigators was observed in Greece (15.1%). This percentage falls to 6% in Cyprus and 1% in Malta.

In total, the item “never confronted with such an issue” was ticked 145 times (18.9% of total answers). The highest percentage was recorded in Malta (35.1%), followed by 21.9% in Cyprus and only 7.5% in Greece. The item “Don’t know” was ticked 136 times (17.7%).

	ALL		CYPRUS		GREECE		MALTA	
	Freq	%	Freq	%	Freq	%	Freq	%
Club official(s)	146	19	86	20.5	40	15.9	20	20.6
Footballers	114	14.8	51	12.1	45	17.9	18	18.6
Referee or other match official	72	9.4	48	11.4	22	8.7	2	2.1
Match organizer/match agent	64	8.3	25	6	38	15.1	1	1
Someone else	92	12	33	7.9	47	18.7	12	12.4
Don't know	136	17.7	85	20.2	41	16.3	10	10.3
Never confronted with such an issue	145	18.9	92	21.9	19	7.5	34	35.1

*This question could be answered with multiple answers. This is why there is no total number altogether, but only for each choice of answer.

3.4b. If you have played official games that were fixed or you suspect were fixed, who in your opinion were the main instigator(s) of the fix? *

A similar picture to that emerged for friendly matches also comes out for official games: 132 respondents said that they had never played in a game that was fixed or they suspected of being fixed (15.9% of all answers), while 126 ticked “Don’t know” (15.1%).

Club officials were considered by respondents as primary instigators of match fixing in official games (25.5%), ahead of football players (19.2%). The highest percentage where club officials were listed was in Malta with 31.6%.

	ALL		CYPRUS		GREECE		MALTA	
	Freq	%	Freq	%	Freq	%	Freq	%
Club official(s)	212	25.5	103	24.8	53	22.2	56	31.6
Footballers	160	19.2	53	12.7	48	20.1	59	33.3
Referee or other match official	73	8.8	48	11.5	12	5	13	7.3
Match organizer/match agent	30	3.6	11	2.6	14	5.9	5	2.8
Someone else	99	11.9	25	6	54	22.6	20	11.3
Don't know	126	15.1	79	19	39	16.3	8	4.5
Never confronted with such an issue	132	15.9	97	23.3	19	7.9	16	9

***This question could be answered with multiple answers. This is why there is no total number altogether, but only for each choice of answer.**

3.5 Reporting

3.5a. Who would you be more comfortable reporting an approach to fix a match to? (order of preference 1-3) - for the whole sample of 694

From those who answered this question, the first institution preferred by players to report an approach to fix a match is the Players' Union, with a high percentage of 84%. The second one would be the Police with 54.8% ahead of the National Football Association on 37.1% and the last on the Sports Integrity Commission. However, it should be noted that since the largest number of participants played football in Cyprus and at the time of the Research the Sports Integrity Commission had just started operating. So, the respondents actually did not select this choice (see results on next page).

1. Player's union		
All	Freq	%
1	338	84
2	40	10
3	24	6
Total	402	100

2. Police		
All	Freq	%
1	126	54.8
2	60	26.1
3	44	19.1
Total	230	100

3. National Association		
All	Frequency	%
1	69	37.1
2	53	28.5
3	61	32.8
4	3	1.6
Total	186	100

4. Sports integrity commission		
All	Freq	%
1	53	30.3
2	62	35.4
3	59	33.7%
4	1	0.6
Total	175	100

3.5b. Who would you be more comfortable reporting an approach to fix a match to? (order of preference 1-3) - Cyprus

In Cyprus, from those who answered the question, the first body of preference to report an approach to fix a match is the Players' Union with a high percentage of 85.3%. The Police came second on 67%, the Sports Integrity Commission with 53.5% and lastly the National Association with 48.2%.

Although the Integrity Commission has only recently been established, it seems that the football players would prefer reporting here than the National Association, which seems to have the lowest level of trust among choices offered to respondents. This possibly reflects a lack of trust in authorities based on insufficient regulatory action on match fixing in previous years.

Focusing on the total number of persons who gave each preference (1-3), the Players' Union comes first again with 218 persons, the National Association comes second with 114 replies, the Police comes third with 109 replies and lastly the Integrity Committee with 71 replies

1. Player's union		
CY	Freq	%
1	186	85.3
2	17	7.8
3	15	6.9
Total	218	100

3. Police		
CY	Freq	%
1	73	67
2	20	18.3
3	16	14.7
Total	109	100

4. Sports integrity commission		
CY	Freq	%
1	38	53.5
2	18	25.4
3	15	21.1
Total	71	100

2. National Association		
CY	Frequency	Percentage
1	55	48.2
2	31	27.2
3	28	24.6
Total	114	100

3.5c. Who would you be more comfortable reporting an approach to fix a match to? (order of preference 1-3) - Greece

In Greece, the Players' Union is also the body that players are more comfortable to report an approach for fixing a match to with 91.6%, and 83 respondents.

In terms of numbers of respondents who made their choices from 1-3, the second preference is the Police with 62 replies, the third is the Sports Integrity Commission with 34 replies and the last is the National Association with only 11 replies, again showing this is the least trusted body.

1. Player's union		
GR	Freq	%
1	76	91.6
2	6	7.2
3	1	1.2
Total	83	100

2. Police		
GR	Freq	%
1	38	61.3
2	17	27.4
3	7	11.3
Total	62	100

4. National Association		
GR	Frequency	Percentage
1	6	54.5
2	1	9.1
3	1	9.1
4	3	27.3
Total	11	100

3. Sports integrity commission		
GR	Freq	%
1	7	20.6
2	10	29.4
3	16	47.1
4	1	2.9
Total	34	100

3.5d. Who would you be more comfortable reporting an approach to fix a match to? (order of preference 1-3) - Malta

For those football players who play in Malta, the first preference for reporting an approach for match-fixing is also the Players' Union, with a percentage of 75.2%. The Police comes second with 25.4%, ahead of the National Association with 13.1% and lastly the Sports Integrity Commission with 11.4%.

1. Player's union			2. Police		
MA	Freq	%	MA	Freq	%
1	76	75.2	1	15	25.4
2	17	16.8	2	23	39
3	8	7.9	3	21	35.6
Total	39	100	Total	59	100

3. Sports integrity commission			4. National Association		
MA	Freq	%	MA	Frequency	Percentage
1	8	11.4	1	8	13.1
2	34	48.6	2	21	34.4
3	28	40	3	32	52.5
Total	70	100	Total	61	100

3.5e Would you be more comfortable reporting a fixing approach anonymously?

The majority of the respondents (67.7%) would be more comfortable reporting a fixing approach anonymously, with the highest percentage belonging to Malta (86.8%). Cyprus comes second with 67.4% and Greece last with only 50.4%.

	ALL		CYPRUS		GREECE		MALTA	
	Freq	%	Freq	%	Freq	%	Freq	%
Yes	433	67.7	273	67.4	61	50.4	99	86.8
No	207	32.3	132	32.6	60	49.6	15	13.2
Total	640	100	405	100	121	100	114	100

3.5f Would you use an online tool that guarantees your anonymity, such as FIFPRO's Red Button app?

Almost 70% of the 547 respondents who answered this question would use a tool that guarantees anonymity, the highest percentage coming from the Maltese sample (84.1%).

	ALL		CYPRUS		GREECE		MALTA	
	Freq	%	Freq	%	Freq	%	Freq	%
Yes	378	69.1	233	69.1	55	53.4	90	84.1
No	169	30.9	104	39.9	48	46.6	17	15.9
Total	547	100	337	100	103	100	107	100

3.6 Vulnerability

3.6a. In your opinion, are younger players more vulnerable for fixing a match?

The vast majority of the 640 players who answered this question believe that younger players are not more vulnerable for fixing a match (86.3%).

	ALL		CYPRUS		GREECE		MALTA	
	Freq	%	Freq	%	Freq	%	Freq	%
Yes	88	13.8	56	13.8	6	5	26	22.8
No	552	86.3	349	86.2	115	95	88	77.2
Total	640	100	405	100	121	100	114	100

3.7 Beneficiaries of match fixing

3.7a. Do you think that friendly games are more frequently fixed than official games?

One in three respondents think that match fixing is more frequent in friendly games than in official games. Most of these answers came from Cyprus (39.4%) and Greece (34.7%). Malta has the lowest percentage of only 8%. The interesting figure from Malta is the “No” answer with 47.8%, compared to only 9.2% and 2.5% from Cyprus and Greece respectively. In Malta, there has been a significant history of fixing in official matches both at club and international level, which may have influenced players’ opinions.

More than half of the sample said that they do not know whether there is more frequent match fixing in friendly games than in official ones (52.3%). The highest percentage of “Don’t know” answers are from the Greece sample (62.8%), followed by the Cyprus sample (51.5%) and the Malta sample (44.2%).

	ALL		CYPRUS		GREECE		MALTA	
	Freq	%	Freq	%	Freq	%	Freq	%
Yes	223	33.2	172	39.4	42	34.7	9	8
No	97	14.5	40	9.2	3	2.5	54	47.8
Don’t know	351	52.3	225	51.5	76	62.8	50	44.2
Total	671	100	437	100	121	100	113	100

3.7b. In your opinion, from a financial perspective, who are the main beneficiaries for fixing friendly games? (multiple replies)

Club officials are the main beneficiaries for fixing friendly games according to 26.3% of respondents. The highest percentage comes from players who play in Malta with 32.1%, followed by Cyprus with 26.8% and Greece with 20.6%.

However, unlike Malta and Cyprus, in Greece the most frequently identified beneficiaries were not “Club official(s)” but “Someone else” with 23%. The survey did not allow for further explanation of who “someone else” could be, so no definitive answer can be given here. However, friends or known associates could be assumed to be one part of this answer as the answer of “someone else” does not mean that this person was unknown to the respondent.

Where a beneficiary was identified, referees were identified by 9.2% of respondents but it is worth noting that the percentage for referees is significantly higher in Cyprus (12.2%) than in Greece and Malta (4.7% in both cases)

	ALL		CYPRUS		GREECE		MALTA	
	Freq	%	Freq	%	Freq	%	Freq	%
Club official(s)	300	26.3	185	26.8	53	20.6	62	32.1
Footballers	171	15	99	14.3	36	14	36	18.7
Referee or other match official	105	9.2	84	12.2	12	4.7	9	4.7
Match organizer/match agent	125	11	61	8.8	45	17.5	19	9.8
Someone else	189	16.6	96	13.9	59	23	34	17.6
Don't know	251	22	166	24	52	20.2	33	17.1

3.7c. In your opinion, from a financial perspective, who are the main beneficiaries for fixing official games? (multiple replies)

As in the case of the friendly matches fixing, the main beneficiaries from manipulating official games are also considered to be the club officials according to 27.2% of respondents.

The second highest response was “I don’t know” with 20.7% of all answers, the highest percentage being from Cyprus (24.4%), followed by Greece (22.3%) and Malta (7.9%).

Footballers are considered the third beneficiary with 18.2%. The highest percentage of responses to this category came from Malta (28.2%). Cyprus and Greece had similar percentages at around 16%.

“Someone else” was the next most frequent answer: 16.8%, the highest percentage coming from Greece (25.3%), followed by Malta (19.8%) and Cyprus (13%).

The item “Referees or other match officials” was ticked 108 times (9.3%). There was a significant difference in responses: from 12.5% in Cyprus to 4.8% in Malta and 3.9% in Greece. The last item was match organisers/match agent with only 7.8% of all answers.

	ALL		CYPRUS		GREECE		MALTA	
	Freq	%	Freq	%	Freq	%	Freq	%
Club official(s)	316	27.2	179	25.5	60	25.8	77	33.9
Footballers	211	18.2	110	15.7	37	15.9	64	28.2
Referee or other match official	108	9.3	88	12.5	9	3.9	11	4.8
Match organizer/match agent	91	7.8	63	9	16	6.9	12	5.3
Someone else	195	16.8	91	13	59	25.3	45	19.8
Don't know	241	20.7	171	24.4	52	22.3	18	7.9

APPENDIX 2.

European Commission funded Erasmus+ project: Regulation of club friendlies

1. Does your federation require notification from clubs before going abroad to play non-official 'friendly' matches? If so, how many days' notice is required before clubs play these games?
2. Are clubs that play non-official 'friendly' matches abroad required by your federation to provide the following details:
 - a. Names of match officials
 - b. Names of FIFA licensed match agent
3. Does your federation require notification of non-official 'friendly' matches to be played by foreign clubs in your country? If so, many days' notice is required before these matches are played?
4. Does your federation assign all match officials for non-official 'friendly' matches played in your country? If not, how are they assigned?
5. Are data scouts who attend non-official 'friendly' matches in your country required to register with the host club?

APPENDIX 3.



ÖFB-BESTIMMUNGEN FÜR FREUNDSCHAFTSSPIELE MIT BETEILIGUNG AUSLÄNDISCHER MANNSCHAFTEN

§ 1 Regelungsbereich

Diese Bestimmungen regeln

- a) die Veranstaltung eines Spieles mit Beteiligung ausländischer Vereins- oder Auswahlmannschaften in Österreich;
- b) die Teilnahme eines österreichischen Vereines an einem internationalen Freundschaftsspiel oder Turnier im In- oder Ausland;

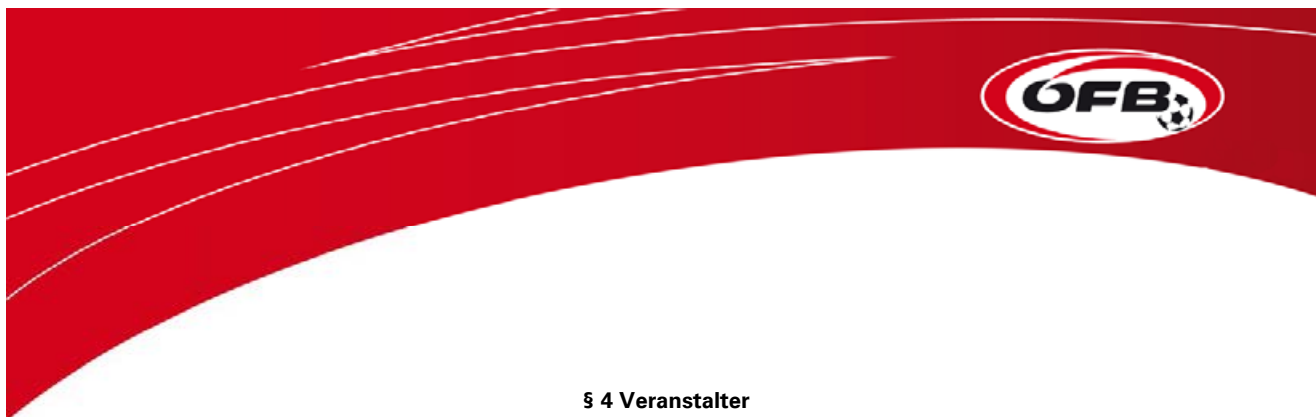
und ergänzen in ihrem Anwendungsbereich die jeweils in Geltung stehenden aktuellen Bestimmungen der FIFA, der UEFA und des ÖFB. Insbesondere wird auf das FIFA-Reglement für internationale Spiele und die ÖFB-Meisterschaftsregeln verwiesen.

§ 2 Grundsätzliches

- 1) Sämtliche in Österreich stattfindenden Fußballspiele mit Beteiligung von ausländischen Auswahl- oder Vereinsmannschaften müssen vom jeweiligen Veranstalter beim zuständigen Verband angemeldet werden.
- 2) Weiters muss jede Teilnahme eines österreichischen Vereines an einem Freundschaftsspiel gegen einen ausländischen Verein sowie jedes Trainingslager eines Vereines der Bundesliga im Ausland dem zuständigen Verband angemeldet werden.
- 3) Die Verbände und der ÖFB sind berechtigt, die Veranstaltung eines Spieles oder Teilnahme an einem Spiel mit Beteiligung ausländischer Mannschaften unter den in diesen Bestimmungen geregelten Fällen zu untersagen.

§ 3 Teilnahme an einem Spiel mit Beteiligung ausländischer Mannschaften

- 1) Ein Verein, der beabsichtigt, im In- oder Ausland an einem Spiel gegen einen ausländischen Verein teilzunehmen, hat dies bis spätestens eine Woche vor dem geplanten Termin bei seinem Verband anzumelden.
- 2) Die Regelungen des § 7 betreffend Untersagung gelten sinngemäß.



§ 4 Veranstalter

- 1) Veranstalter im Sinne dieser Bestimmungen ist
 - a) ein dem ÖFB angeschlossener Verein, welcher ein Freundschaftsspiel unter Beteiligung einer oder mehrerer ausländischer Mannschaften
 1. organisiert,
 2. auf seine Rechnung durchführt ,
 3. die Veranstaltung bei der zuständigen Behörde angemeldet hat,
 4. bzw. derjenige, auf dessen Areal die Veranstaltung durchgeführt wird;
 - b) ein von der FIFA oder UEFA lizenzierter Spielvermittler;
 - c) in Ausnahmefällen eine Person/Organisation, welche nicht Mitglied bei einem Verband (Verein) ist.
- 2) Veranstalter nach Abs. 1 lit. b und c sind verpflichtet sich vorab dem Regelwerk des ÖFB, der FIFA und der UEFA zu unterwerfen. Der Verein, auf dessen Platz das Spiel stattfindet, haftet gegenüber dem ÖFB und seinen Verbänden jedenfalls solidarisch.

§ 5 Anmeldung und Zuständigkeit

- 1) Der Veranstalter hat ein geplantes Spiel über das „Fußball-Online“ System bei jenem Verband anzumelden, auf dessen Verbandsgebiet das Spiel stattfindet.
- 2) Der Veranstalter ist verpflichtet, sämtliche benötigten Unterlagen im „Fußball-Online“ System hochzuladen.
- 3) Über Vergehen nach den einschlägigen ÖFB-Bestimmungen entscheidet das ÖFB-Komitee für Spieler-/Spielvermittler. Gegen Entscheidungen des Komitees steht den Betroffenen der schriftliche Protest an den Rechtsmittelsenat des ÖFB zu. Dieser ist binnen 14 Tagen nach Zustellung der Entscheidung auszuführen und einzubringen. Die Protestgebühr beträgt € 250,- und verfällt bei Abweisung des Protestes zugunsten des ÖFB. Der Rechtsmittelsenat entscheidet in letzter Instanz endgültig.

§ 6 Fristen

- 1) Die Anmeldung eines Freundschaftsspieles bzw. Turniers mit Beteiligung ausländischer Mannschaften, das in Österreich stattfindet, muss bis spätestens zwei Wochen, bei internationalen Spielen der ersten oder zweiten Kategorie gemäß FIFA-Reglement für internationale Spiele spätestens drei Wochen vor dem geplanten Spieltermin (Einlangen beim Verband) erfolgen.



- 2) Die Teilnahme an einem Freundschaftsspiel bzw. Turnier mit Beteiligung ausländischer Mannschaften im In- oder Ausland muss bis spätestens eine Woche vor dem geplanten Spieltermin angemeldet werden (Siehe auch § 3).
- 3) Erfolgt keine rechtzeitige Anmeldung, kann vom zuständigen Verband bzw. auch vom ÖFB ein Verspätungszuschlag von je bis zu € 150,- eingehoben bzw. die Teilnahme bzw. Veranstaltung des Spieles untersagt werden und erfolgt gegebenenfalls keine Schiedsrichterbesetzung.

§ 7 Untersagungsgründe

- 1) Der zuständige Verband prüft die Einhaltung der verbandsrechtlichen Rahmenbedingungen (Mitgliedschaft des Vereines bei einem Mitglied der FIFA, Sperre des ausländischen Vereines, Beeinträchtigung des Meisterschaftsbetriebes, Einhaltung der einschlägigen Bestimmungen und Fristen) und nimmt die Anmeldung zu Kenntnis.
- 2) Insbesondere in folgenden Fällen kann die Teilnahme bzw. Veranstaltung untersagt werden:
 - a) wenn der ausländische Gegner nicht über einen Nationalverband der FIFA angehört bzw. wenn er oder sein Verband gesperrt sind;
 - b) wenn von den Verbänden festgesetzte wirtschaftliche Mindestbedingungen nicht eingehalten werden;
 - c) wenn Unterlagen entsprechend § 5 Abs. 3 nicht vorgelegt werden;
 - d) wenn ein Verein nicht unter seinem Namen antritt;
 - e) wenn durch das betreffende Spiel ein heimischer Pflichtbewerb gestört würde;
 - f) wenn der Reiseplan bei Auslandsspielen nicht so erstellt ist, dass die Mannschaft spätestens 48 Stunden vor dem nächsten Pflichtspiel am Spielort oder drei Tage vorher im Heimatort eintrifft. Bei Übersee- oder Auslandsreisen, die sich über mehr als drei Wochen erstrecken, muss der Verein mindestens eine Woche vor Beginn des Herbst- oder Frühjahrsmeisterschaftsdurchganges nach Österreich zurückkehren;
 - g) wenn das betreffende Spiel am selben Tag oder bis zu 2 Tage vor einem angesetzten Spiel des ÖFB-Cups ausgetragen werden soll.
- 3) Weiters kann die Teilnahme bzw. Veranstaltung untersagt werden, wenn die Anmeldung nicht rechtzeitig vollständig erfolgt ist.
- 4) Dieser Vorgang bezieht sich ausschließlich auf sportspezifische Kriterien. Der Veranstalter ist darüber hinaus verpflichtet, sämtliche von der österreichischen Rechtsordnung geforderten Kriterien (wie z.B. Auflagen der Sicherheitsbehörde) einzuhalten und trägt hierfür die volle Verantwortung.



§ 8 Organisation, Schiedsrichtergebühren und -besetzung

- 1) Der Verband nimmt das Spiel entgegen und informiert über das „Fußball-Online“ System die Geschäftsstelle des ÖFB. Der ÖFB kann die Veranstaltung bei Vorliegen wichtiger Gründe untersagen. Als wichtiger Grund gelten insbesondere die Terminkollision mit einem Spiel der A-Nationalmannschaft oder der U-21-Nationalmannschaft, Bedenken, dass die Sicherheit der Veranstaltung gefährdet ist sowie die nicht rechtzeitige Entrichtung eines allfälligen Kostenersatzes.
- 2) Die Besetzung der Spiele erfolgt grundsätzlich durch das Schiedsrichterkollegium des Landesverbandes. Für Spiele mit Beteiligung von Vereinen der obersten Leistungsstufe (BL 1) und/oder ausländischen Mannschaften, welche in ihrem Nationalverband in der obersten Leistungsstufe spielen oder A-Verbandsmannschaften, erfolgt die Besetzung durch das ÖFB-Schiedsrichterkomitee für den Elite-Bereich. Sollten die Ressourcen der BL-Schiedsrichterliste nicht ausreichen, kann der ÖFB das Schiedsrichterkollegium des Landesverbandes um die Besetzung des Spiels ersuchen.
- 3) Die Schiedsrichtergebühren sind wie folgt geregelt
 - a) für Spiele zweier internationaler Mannschaften in der ÖFB-Schiedsrichter- Besetzungs- und Gebührenordnung;
 - b) für Spiele der Vereine der ÖFB-Frauenliga in der ÖFB-Schiedsrichter- Besetzungs- und Gebührenordnung;
 - c) für Spiele mit Beteiligung von Vereinen der Bundesliga in Abschnitt 6 der ÖFB-Schiedsrichterordnung;
 - d) für Spiele eines Landesverbandsvereines gegen eine ausländische Mannschaft in den Bestimmungen der Landesverbände;
- 4) Die Schiedsrichtergebühren sind vom Veranstalter zu tragen.
- 5) Die Verbände und der ÖFB sind berechtigt, einen Kostenersatz für den administrativen Aufwand von je bis zu € 150,- für Spielansuchen gegen ausländische Vereine vorzuschreiben.

§ 9 Sicherheit und Infrastruktur

- 1) Für sämtliche in Österreich stattfindenden Fußballspiele mit Beteiligung von ausländischen Auswahl- oder Vereinsmannschaften sind die jeweiligen Platz- und Hausordnungen anzuwenden.
- 2) Hinsichtlich erlaubter und verbotener Gegenstände wird auf das Dokument „Liste der verbotenen Gegenstände gültig für Spiele des Cups des Österreichischen Fußball-Bundes und des Ladies-Cup des Österreichischen Fußball-Bundes“ verwiesen.



Die Verwendung von pyrotechnischen Artikeln ist **ausnahmslos** verboten.

- 3) Der Veranstalter ist verantwortlich, falls es in jenen Bereichen (inner- und außerhalb des Stadions), in denen er das Hausrecht ausübt, zu provokativen Aktionen durch Besucher kommt (z.B. inakzeptable verbale Provokationen von Zuschauern gegenüber Spielern, Offiziellen oder gegnerischen Anhängern, rassistisches Verhalten, provokative Spruchbänder oder Banner, usw.). Falls es zu solchen Vorfällen kommt, muss der Veranstalter über die Lautsprecheranlage intervenieren und mit dem gelindesten Mittel sein Hausrecht durchsetzen. Aus diesem Grund sind bei der Einlasskontrolle sämtliche Transparente, Spruchbänder, Banner, etc. auf deren Inhalt zu kontrollieren.
- 4) Der ÖFB kann einzelne Spiele als Risikospiele einstufen. Dabei gelangen die diesbezüglichen Regelungen der Sicherheitsrichtlinien für den Cup des Österreichischen Fußball-Bundes sowie für den Ladies-Cup des Österreichischen Fußball-Bundes sinngemäß zur Anwendung.
- 5) Der ÖFB kann für einzelne Spiele anordnen, dass diese in von der Österreichischen Fußball-Bundesliga für bestimmte Spielklassen zugelassenen Stadien auszurichten sind.
- 6) Das ÖFB-Komitee für Spieler-/Spielvermittler kann bei Verstößen gegen diese Bestimmungen die gemäß der ÖFB-Rechtspflegeordnung oder ergänzender Bestimmungen vorgesehenen Sanktionen aussprechen, wobei der Veranstalter als veranstaltender Verein gemäß der ÖFB-Rechtspflegeordnung zu behandeln ist.

§ 10 Inanspruchnahme von Agenten oder Vermittlern

Sofern Spiele nicht zwischen Vereinen oder Verbänden direkt vereinbart werden, ist die Inanspruchnahme von lizenzierten Spielvermittlern verpflichtend. Es sind die entsprechenden internationalen Bestimmungen einzuhalten.

§ 11 Spiele in grenznahen Gebieten

Die Landesverbände sind berechtigt, ihre Vereine von der Verpflichtung zur Anmeldung der Veranstaltung von oder von der Verpflichtung zur Anmeldung der Teilnahme an Spielen mit Beteiligung ausländischer Mannschaften zu befreien, sofern beide beteiligten Vereine ihren Vereinssitz im grenznahen Gebiet (Umkreis von 50km zur gemeinsamen Staatsgrenze) haben.

§ 12 Sonstiges

- 1) Die in diesen Bestimmungen verwendete männliche Form gilt auch für Frauen.



- 2) Für diese Bestimmungen gelten die Definitionen der ÖFB-Meisterschaftsregeln.
- 3) Diese Bestimmungen treten mit 1.5.2016 in Kraft und gelten für alle Spiele mit Beteiligung ausländischer Mannschaften, deren Anmeldung nach diesem Datum erfolgt.

APPENDIX 4.

Suspicious friendlies by country

	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>TOTAL</u>
<u>VENUE</u>	<u>Games</u>	<u>Games</u>	<u>Games</u>	<u>Games</u>	<u>Games</u>	<u>Games</u>
Cyprus	16	8	8	7	5	44
Ukraine	1	7	22	4	4	38
Czech Republic	0	3	0	4	15	22
Turkey	4	4	4	0	6	18
Sweden	0	6	2	0	8	16
Russia	0	0	0	5	7	12
Austria	3	4	0	2	3	12
Croatia	2	0	3	3	3	11
Germany	3	2	1	0	5	11
Slovenia	2	4	0	1	2	9
Norway	0	2	3	2	1	8
Bulgaria	0	1	3	1	3	8
Spain	1	0	1	5	0	7
Greece	0	0	1	2	2	5
Armenia	0	0	0	2	3	5
Romania	1	1	2	0	0	4
Ireland	2	1	0	1	0	4
Poland	0	1	2	1	0	4
Serbia	0	0	1	2	0	3
Netherlands	1	0	1	0	0	2
Portugal	0	2	0	0	0	2
Georgia	0	0	0	0	2	2
Slovakia	0	0	0	0	2	2
Northern Ireland	0	1	0	0	0	1
Hungary	0	1	0	0	0	1
Lithuania	0	1	0	0	0	1

APPENDIX 5.

Suspicious friendlies played in neutral venues

Country	2016	2017	2018	2019	2020	TOTAL
Cyprus	11	5	6	0	1	23
Turkey	4	3	4	0	2	13
Spain	0	0	0	5	0	5
Netherlands	4	0	1	0	0	5
Bulgaria	0	1	2	1	0	4
Croatia	1	0	1	2	0	4
Austria	0	3	0	0	1	4
Slovenia	1	0	0	1	0	2
Slovenia	0	1	0	0	0	1
Poland	0	0	1	0	0	1
TOTAL	21	13	15	9	4	62

APPENDIX 6.

Intelligence Report

In February 2019, Latvian club Ventspils played five friendlies in Marbella in Spain as part of a training camp staged by Football Impact, which is a promoter that arranges around 150 friendlies for over 130 teams from more than 40 different countries every year.¹¹ Four of the games played by Ventspils on this training camp produced betting alerts.

Ventspils were traditionally one of the best-funded Latvian clubs and the first Latvian club to qualify for the Europa League group stages in 2009/10, but the owner who funded this success, Yuri Bespalov, died in 2012, and the club was taken over by the town council.¹²

According to local sources, the club was in danger of folding due to lack of money, when Adlan Shishkhanov (pictured) officially took control in early 2018. Shishkhanov is a Chechen from the Republic of Ingushetia and was named in the Panama Papers as a shareholder of Mining Investment Solutions.¹³



Source: optibetvirsliga.com

Shishkhanov has links to Mikail Gutseriev, a Chechen billionaire who is the founder of Russian oil company, Russneft, and may well be a relation as Mikail Shishkhanov is the nephew of Gutseriev.

In 2007, Adlan Shishkhanov and his partner Murat Luyanov were reported as trying to buy a 49% stake in German football club Carl Zeiss Jena for investment of €25m over the next five years.¹⁴ This acquisition was to be made through a Caribbean-based company, but never materialised.¹⁵

Shishkhanov came to Moldova in 2008 and took control of Dacia Chişinău. Under his ownership, the club won the Divizia Nationala title in 2011.¹⁶ Shishkhanov then left Dacia to take control of another Moldovan club, Zimbru.¹⁷ He reportedly placed a \$2m bet on Zimbru winning the title the same year but they only finished third.¹⁸

Shishkhanov is described as “impulsive” and “ruthless” and routinely sacks managers after only a short time in control. In 2012, he sacked Oleg Bejenar after just 25 days in charge of Zimbru. On occasions, Shishkhanov has personally taken charge of team affairs at his clubs.¹⁹ In 2017, he appeared at a press conference for Dacia when the media were expecting the club’s coach or captain.²⁰

In one media report, Shishkhanov is only described as Zimbru’s co-owner, suggesting he still had a partner.

In 2012, Shishkhanov went public with allegations that another Moldovan club, Sfântu Gheorghe, was fixing matches at the behest of the club’s owner.²¹ The Federation of Moldovan Football (FMF) dismissed Gheorghe chairman Valeriu Renita, banned him from all football for

¹¹ <http://www.footballimpact.com>

¹² <https://www.girondins.com/en/focus-fk-ventspils>

¹³ <https://offshoreleaks.icij.org/nodes/80124160>

¹⁴ http://www.netstudien.de/_gutseriev.pdf

¹⁵ https://www.transfermarkt.at/millionen-aus-russland/thread/forum/76/thread_id/1147/page/2#anchor_2167

¹⁶ <https://www.ipn.md/en/sport/62826>

¹⁷ http://moldova.sports.md/football/articles/25-02-2011/8597/video_of_the_week_adlan_shishkhanov_to_become_zimbru_s_new_president/

¹⁸ <https://www.dailypost.co.uk/sport/football/football-news/europa-league-bangor-city-fc-2655779>

¹⁹ http://www.theplayersagent.com/knowledgecenter/article/moldavian_winter_transfers_outcome_2014_2015

²⁰ <http://www.infosport.mk/tag/adlan-shishkhanov/>

²¹ <https://point.md/ru/novosti/sport/shishkhanov-despre-cazul-blaturilor-dosarul-trebuia-facut-public>

five years and fined him \$15,000 but no details were made public and Shishkhanov responded: “The file had to be made public, so that everything was transparent.”

In 2014, Shishkhanov resigned as president of Dacia after the club failed to qualify for European competition, saying: “I do not support the Olympic principle that it is the participation that counts. I was taught to win. The situation in the Moldovan football made Dacia finish fifth the last season.”²² Despite appearing to resign, Shishkhanov continued to run Dacia.

As early as 2010, Dacia had been going on preseason training camps in Antalya in Turkey.²³ Under Shishkhanov, both Zimbru and Dacia would, like many Eastern European clubs, go on training camps in Turkey, where there have been numerous alerts from betting companies about suspicious friendlies at both club and international level.²⁴

In 2012, a game between Dacia and Romanian club Vointa Sibiu was extended by the referee to 100 minutes with the final goal scored at the very end of the game in a penalty.²⁵ This match was played in the middle of a flurry of suspicious matches in Antalya.

In 2013, Dacia’s camp in Turkey was cancelled, but the club returned to the country the following year.²⁶ In 2014, Dacia played a friendly with Russian club Amkar Perm, which has been the subject of betting alerts over suspicious friendlies both before and after this game with the Moldovan club.²⁷

On March 21, 2014, Zimbru Chişinău played another Moldovan club, Sheriff Tiraspol, in a friendly, which was flagged up as suspicious.²⁸ In February 2015, Dacia also played FK Rostov in a friendly in Turkey.²⁹

There was also a spate of suspicious friendlies

played by Moldovan clubs, particularly Dinamo-Auto, FC Milsami Orhei and Olimpia Balti (now FC Zaira Balti), that targeted the Asian gambling markets. The losses were such that betting operators in Moldova ceased offering friendlies played by Moldovan clubs.

In April 2017, the Moldovan government began working on a case for tax evasion and money laundering and Shishkhanov left the country in September 2017.³⁰

In March 2018, Dacia announced they would not take part in that year’s Moldovan championship and in April 2018, Moldovan police raided Dacia and Shishkhanov was accused of tax evasion and money laundering including paying club in cash in envelopes, which had avoided nearly 10m Moldovan Lei (£460,000) in tax.³¹ Three other clubs were implicated, but Dacia were at the centre of the media coverage and the Moldovan government claimed that the club had made unofficial payments of more than 60m Moldovan Lei (£2.7m). If convicted, Shishkhanov faces up to six years in prison in Moldova.

According to sources in Latvia, Shishkhanov took control of Ventspils in early 2018, but the Russian has said he took control in late 2017.³² Another report claimed that Shishkhanov also expressed interest in buying into the reigning champion, Spartaks Jurmala.³³ While in Moldova, Shishkhanov was linked to Oleg Gavrilov, who was banned for life in 2009 for his part in a match fixing scandal at Latvian club, Daugavpils.³⁴

This generated negative media coverage in Latvia and soon after Shishkhanov arrived, the British coach, Paul Ashworth, and up to 10 Latvian players left Ventspils. Four players from Dacia and other members of staff from the Moldovan club were recruited.³⁵

²² <https://www.ipn.md/en/sport/62826>

²³ <https://www.ipn.md/en/societate/28714>

²⁴ <https://www.ipn.md/en/sport/66808>

²⁵ <https://translate.google.co.uk/translate?hl=en&sl=ro&u=https://www.gsp.ro/fotbal/liga-1/investigatie-gsp-dovada-ca-arbitrii-fara-ecuson-mint-au-arbitrat-meciuri-dubioase-in-antalya-si-in-2012-primarul-pnl-a-fost-recunoscut-de-fotbalistul-care-a-iesit-de-pe-teren-in-semn-de-protest-fata-de-blat-500742.html&prev=search>

²⁶ <https://www.uefa.com/memberassociations/news/newsid=1925326.html>

²⁷ <http://www.panorama.com.al/sport/presidenti-multimiliarder-i-ventspils-nuk-e-doja-teuten-por-e-eliminojme/http://cherchesov.com/coach/news.asp?id=2176&lang=eng&kind=news&page=36&collection=4>

²⁸ Annual Fixed Matches Report (Federbet, 2014), p19

²⁹ <https://www.youtube.com/watch?v=h-MfTE-kb9w&app=desktop>

³⁰ <http://tv8.md/2018/04/19/foto-perchezitii-la-clubul-sportiv-fc-dacia-administratia-suspectata-ca-ar-fi-achitat-fotbalistilor-salarii-in-plic/>

³¹ <http://tv8.md/2018/04/19/foto-perchezitii-la-clubul-sportiv-fc-dacia-administratia-suspectata-ca-ar-fi-achitat-fotbalistilor-salarii-in-plic/>

³² <http://www.panorama.com.al/sport/presidenti-multimiliarder-i-ventspils-nuk-e-doja-teuten-por-e-eliminojme/>

³³ <https://footballski.fr/fk-ventspils-des-interrogations-et-de-lespoir-avant-leurope>

³⁴ <https://www.baltictimes.com/news/articles/23913/>

³⁵ <https://footballski.fr/fk-ventspils-des-interrogations-et-de-lespoir-avant-leurope>

On 19/7/2018, Ventspils played Albanian club Luftetari Gjirokastër in a Europa League qualifier, which was widely considered fixed. Ventspils were 5-0 up from the first game, but in the return conceded a shambolic equaliser in injury time to draw 3-3.³⁶ By the end of the game, odds on a draw had reportedly fallen to 1.80 according to social media.³⁷

In July 2018, Ventspils played Bordeaux, again in the Europa League. The French team won 1-0, but Russian referee Sergey Lapochkin, which has been on FIFA's international list since 2013, was subsequently suspended for 90 days for allegedly failing in his duty to inform UEFA about an approach.³⁸

In February 2019, Ventspils travelled to Marbella for their training camp and a betting alert was raised in the first game against Russian club FK Rostov at La Quinta on February 18, when the Latvians lost 3-0. On February 22, Ventspils played Norwegian club Sarpsborg at the Burgas Quintana Stadium and lost 3-2. This game generated a betting alert at an Asian bookmaker, which then decided that the game was "probably not" fixed.

On February 25, Ventspils played Norwegian club Ranheim at Arroyo Enmedia in Estepona and won 3-1. After scoring a third goal on 90 minutes, Ventspils conceded a questionable goal in second half injury time.³⁹ This game did generate a betting alert.

The fourth game for Ventspils was back in Estepona against Norwegian club Jerv on February 28 and screened live on YouTube. The game was competitive until, with around 10 minutes remaining, the Jerv players reported that Ventspils simply stopped defending and the Norwegian club won 1-0 with a goal in the 89th minute.⁴⁰

Opportunities to give penalties were not taken up by match officials, who were all from Finland and on holiday and took the opportunity to control the game as part of mid-winter training. While there is no suspicion of any involvement by the Finnish officials, their appointment

contravenes RFEF guidance. The officials later said they had no knowledge of any attempts to manipulate the game and only began to realise this was happening during the play.

After the match, the Jerv head coach Arne Sandste said: "In the heat of the moment, it looked as if Ventspils pushed every man into the attack, in an attempt to win. This resulted in us having six big chances alone with a keeper in the last minute. The referees must have reported it to UEFA as a possible case of match-fixing."⁴¹

Ventspils dismissed the accusations as "unfounded allegations" and Football Impact claimed not to have heard about the incident when contacted by Norwegian media. After the game, UEFA were reported as opening an investigation into the match. On Ventspils own website, a clip of the match does not include the end of the game when the tactics changed.⁴²

On March 1, Ventspils finished their training camp in Spain with a 2-1 win over Norwegian club Molde at La Quinta. No betting alert was generated.

According to an investigation by the International Centre for Sports Security (ICSS) in 2015, Football Impact has allegedly been involved with fixing large number of friendly matches involving clubs from the Nordic countries, Eastern and Western Europe, as well as Africa.^{43 44} The main venue for these matches is the Marbella Football Centre, which between 2011 and 2015 staged 575 matches and was where Ventspils played in 2019.

The matches staged by Football Impact were, according to the ICSS report, all refereed by officials from the Andalucia Refereeing Committee. The manipulated matches are described as 'five star' in that they included the direct involvement of players from both teams and the match officials.

In July 2019, the Latvian Football Federation banned Shishkhanov from all LFF competitions until October 21 2019 for abusive behaviour

³⁶ <https://www.youtube.com/watch?v=SzTxhWh8FXE>

³⁷ <https://twitter.com/hashtag/luftetari?lang=en>

³⁸ <http://keirradnedge.com/2021/04/15/russian-referee-suspended-by-uefa-over-matchfix-suspicions/>

³⁹ http://sportacentrs.com/futbols/virsliga/25022019-virsliga_gatavojas_ventspils_uzvar_norveg

⁴⁰ <https://www.youtube.com/watch?v=oKa9Cr4MNcY&feature=share>

⁴¹ <https://norwaytoday.info/sport/match-fixing-fc-jerv-ventspils/>

⁴² <http://www.ventspilnieks.lv/sports/fk-ventspils-jauns-vartsargs-tacu-klubs-zaude-norvegijas-1-ligas-klubam/>

⁴³ <https://theblacksea.eu/stories/football-leaks-2018/eric-mao-asset-stripper-european-football/>

⁴⁴ Investigation Report, Malaga Suspected Fixed Club Friendlies (ICSS)

towards match officials. Shishkhanov had made strongly worded accusations in press conferences and in the officials' changing rooms claiming that the officials were fixing matches in favour of Ventspils' opponents. This original ban was later reduced to August 21 on appeal.⁴⁵

According to local sources, users of Latvian local betting forums widely believe that the mafia controls Ventspils. When users of the Latvian betting forums see odds start to shift on matches involving Ventspils, they assume the game is fixed and betting increases. This can produce alerts due to low liquidity in betting markets.

In the 2019/20 UEFA Europa League, Ventspils beat Albanian club Teuta and Gzira of Malta to reach the third qualifying round. One of the matches against Gzira produced a betting alert.

In the third round, Ventspils faced Portuguese club Vitória de Guimarães. In the home leg in Riga on August 8, Ventspils lost 3-0. In the return leg in Portugal on August 14, Ventspils lost 6-0 and conceded a number of soft goals towards the end of the game. Passengers on the same flight out of Portugal as Ventspils reported that the mood of the players was not one of a team that had just lost 9-0 on aggregate. This match also produced a betting alert.

By reaching the third qualifying round, Ventspils had already earned €780,000 in UEFA prize money.⁴⁶ In 2017, average club revenue in the Latvian Virsliga was €637,500.⁴⁷ After being eliminated from Europe, the performance of Ventspils' players was generally perceived to have improved.

Shishkhanov was frequently in Moscow, but in September 2019 was again found guilty by the LFF of being abusive towards match officials in Latvian Virsliga matches and banned, this time until the end of 2019. This ban prohibits Shishkhanov from entering the Ventspils' changing rooms 30 minutes before kick-off.

In October 2019, Latvian police launched a criminal case into match fixing and Oleg Gavrilov was detained, then later released on bail of €30,000.⁴⁸

In the 2019 Virsliga season in Latvia, suspicions were raised about Ventspils' Virsliga matches with Liepaja and Daugavpils.⁴⁹ After beating Ventspils in June 4-0, players from Liepaja privately expressed concerns that the match had not been 'right'.⁵⁰ Against Daugavpils, local betting sources suggest that €80,000 was gambled on Ventspils winning the game.⁵¹ Video analysis shows soft goals conceded by Daugavpils as Ventspils won 3-0.⁵²

The RFEF believes that problems with these games lies within the club, saying that identifying friendly matches played within Spain are hard to track if the camp operators do not register the matches with the relevant authorities. In Spain, training camp operators report that the cost of officials after registering a friendly match with the RFEF is in the region of €3,000.

Operators do not want to spend this sum on for officials for low-key matches played within training camps by clubs who are paying lower rates. As a consequence, these matches are still being registered with the regional federation, who supply match officials at a cheaper rate. This was identified as a problem by ICSS back in 2015.

The RFEF reported the 2019 games to UEFA and the Spanish police. In August 2020, Shishkhanov was included on a persona non-grata list by the Latvian government on the advice of the state security services.⁵³

In June 2021, Ventspils was banned for seven years from UEFA competition, Shishkhanov was banned from any football-related activity for life and former Ventspils official Nikolajs Djakins was banned for four years.⁵⁴

⁴⁵ [https://lff.lv/files/documents/452/AK%20lēmums%20Nr.3-2019%20\(FK%20Ventspils\).pdf](https://lff.lv/files/documents/452/AK%20lēmums%20Nr.3-2019%20(FK%20Ventspils).pdf)

⁴⁶ <https://www.uefa.com/uefaeuropaleague/news/newsid=2616279.html>

⁴⁷ Club Licensing Benchmarking Report: Financial Year 2017 (UEFA 2019)

⁴⁸ https://www.baltictimes.com/police_in_cooperation_with_uefa_investigate_possible_match-fixing_in_latvian_football/

⁴⁹ <https://www.youtube.com/watch?v=gebKBznpjZI> & <https://www.youtube.com/watch?v=SodWyzmPGwA>

⁵⁰ <https://www.youtube.com/watch?v=gebKBznpjZI>

⁵¹ <https://m.facebook.com/krisjanis.klavins.9/posts/10158523655044832>

⁵² https://www.youtube.com/watch?time_continue=36&v=IHWSto-LPn0

⁵³ <http://www.baltic-course.com/eng/legislation/?doc=158595>

⁵⁴ <https://disciplinary.uefa.com/insideuefa/disciplinary/updates/026a-127a9f9dd2b4-f2173f6296c5-1000--cedb-decisions-on-fk-ventspils/>

APPENDIX 7.

Intelligence Report

In the summer of 2019, Greek club Panachaiki undertook a three-game tour of Belgium. Suspicious were raised in the Greek media over how a Greek second division club could afford to travel to Belgium for a week by Alexis Kougias (pictured), a former owner of Panachaiki. A player then a lawyer, Kougias was president of AEK Athens between 1997 and 2004, then became president of Panachaiki the following year and the major shareholder in 2009.

Kougias was also an agent and had frequently run-ins with referees, opponents and the media. In 2011, Kougias gave evidence into an inquiry into the Calciopoulo match fixing scandal in Greek football.⁵⁵ He later left Panachaiki, but remains a high-profile and outspoken figure in Greek football and the media.



Source: alexiskougias-law.gr

In the summer of 2019, Kougias claimed that 14 friendlies involving Greek clubs had been fixed in 2018 and another friendly involving Apollo Larissa and Volos in Bulgaria. He also questioned Panachaiki's tour of Belgium and queried how the club could afford to spend €50,000 on a preseason tour.

No-one from Panachaiki responded to these claims and in 2020/21, the club had a completely different board and were relegated after financial difficulties.

About Panachaiki FC

Panachaiki FC is from Patras and was founded in 1891. The club played in the UEFA Cup in 1973/74, but most of the club's time has been spent in the lower leagues. The club dropped into the third tier in 2006/07 and only returned to Division Two in 2011/12. After financial problems

in 2016, the club lost its professional status.

A group of 15 local entrepreneurs subsequently rescued Panachaiki. Konstantinos 'Kostas' Katsouranis, who won Euro 2004 with Greece and started his career with Panachaiki in the 1990s, was brought in as technical director. The club regained its professional status and seemed to work professionally with a long-term plan of returning in the Greek Superleague.

However, Katsouranis resigned from his position as technical director and almost everyone from the original group of businessmen left the club. From the beginning of the 2019/20 season, the shareholders scheme of the team was the following:⁵⁶

Dionisis 'Sakis' Kalogeropoulos 51.18%
 Platonas Marafefas 22.19%
 Panachaiki A.C 10.00%
 Antonis Kounavis 4.86%
 Panagiotis Polidoropoulos 3.08%
 Capelli Sport 2.49%
 Froso Kontotheodorou 2.09%
 Antonis Potamitis 2.09%
 Georgios Dendrinos 1.89%
 Kostas Katsouranis 1.62%
 Dimitris Nikolidakis 0.98%
 Grigoris Tsagarakis 0.20%
 Georgios Apostolopoulos 0.30%



Source: Wikipedia (public domain)

Dimitris Drosos (pictured right), who played for Panachaiki as a junior, took control of the football section. Drosos previously ran a Maltese-based bookmakers, Gold Victory, and in 2009 was arrested for fraud and misappropriating €500,000 from customer accounts.

Drosos was released in 2010 on medical grounds and fled for Greece, forfeiting a €70,000 bond.⁵⁷ After the Maltese authorities issued a European Arrest Warrant, Drosos was arrested in an Athens suburb, extradited to Greece and jailed in 2012 for 14 months.⁵⁸ Drosos was also named in the Panama Papers with links to four offshore entities.⁵⁹

⁵⁵ http://www.grreporter.info/en/evidence_matchfixing_greek_football_championship/4192

⁵⁶ <https://www.a-sports.gr/articles-223367/oi-metoxoi-kai-ta-akribh-pososta-sthn-pae-panaxaikh.htm#.YT9nRS1Q1Bx>

⁵⁷ <https://www.bookmakersreview.com/gambling-news/gold-victory-owner-dimitris-drosos-arrested-in-greece/81804/>

⁵⁸ <https://www.maltatoday.com.mt/news/national/20792/greek-businessman-jailed-for-500-000-betting-fraud-20120905#.Xih2Cy2cZNO>

⁵⁹ <https://offshoreleaks.icij.org/nodes/55034345>

MATCH INFORMATION

- 17/7/2019

Stadion De Visputten, Hoboken, Belgium

Beerschot-Wilrijk (Bel) vs Panachaiki (Gre)

HT: 1-0

FT: 2-0

<https://www.youtube.com/watch?v=W5RhiPh3VAE>

- 20/7/2019

Daknamstadion, Lokeren, Belgium

Lokeren (Bel) vs Panachaiki (Gre)

HT: 0-0

FT: 0-0

- 21/07/2019

Versluys Arena, Oostende, Belgium

KV Oostende (Bel) vs Panachaiki (Gre)

HT: 2-1

FT: 4-1

Match report

The home team started fiercely with a blocked shot from Vargas. With a good combination football, the Kustploeg visibly embarrassed the visitors in the initial phase. The Ostend lead came after a measured pass from D'Haese came to Rajsels. The striker left the Greek goalkeeper with a hard shove no chance (1-0). Hardly kicked off or KVO doubled its lead through D'Haese, who gave the visiting goalkeeper a good shot (2-0). On the other side, Schelfout hit a loud bang from the intersection. The resulting corner kick was headed by Marković past a hopeless Schelfout (2-1). After the somewhat surprising connection goal, the visitors came a little more into the match, including a hard shot over the home goal. On the other side, Rajsels tried it with a drop-off. Just before coffee, a Greek headed a corner kick over the Oostende goal.

The home team came out of the dressing room motivated. This resulted in a goal from Banda who shot a falling ball past the Greek goalkeeper (3-1). After a solid Ostend attack, Vargas placed the ball just over the crossbar.

On the other side, Schelfout again showed his class when he reacted alertly to a hard kick. Boonen tried with a cross, but his attempt went wide. Substitute Sakala escaped, but decided against the Greek goalkeeper. The next action was again via Sakala, but now the attacker just headed over a Boonen cross. After a personal action, Sakala saw his goal for offside being rejected. On the other side, the substitute Badu had a magnificent reflex in the house on a close shot. In the absolute final phase, a Greek defender worked the ball into his own goal (4-1).

KV Oostende: 11' 1-0 (Rajsels), 12' 2-0 (D'Haese), 23' 2-1 (Marković, 49' 3-1 (Banda), 88'

Panachaiki: 47' Vargas

KV Oostende: Schelfout (74' Badu), Lombaerts, Marquet, Neto (74' Tanghe), Boonen, Banda, Vargas (74' Mbye), Ndenbe, Bataille, D'Haese (46' Sakala) Rajsels (89' Morina)

Match report translated from: <http://www.kvo.be/nieuws/vriendschappelijk-kv-oostende-panachaiki-4-1>

STATS PERFORM BETTING SUMMARY

This match was not covered by RunningBall, and had severely limited coverage elsewhere, with only Bet365's prices visible, so this is not a comprehensive analysis of global betting markets.

Oostende were strong favourites on a -1.25 Handicap line at kick-off. There was little movement in the prices until after Oostende scored twice in quick succession from 10 minutes in-play. The line moved all the way to -2.00, but this is not wholly unexpected given the start to the match.

Panachaiki pulled a goal back midway through the half, but there was no clear support for Oostende at this point. There was occasional support during this second half for Oostende, enough to ensure that the Handicap decayed more slowly than expected. Oostende were still only -0.25 1.75 just before the final goal in the 87th, but there were no signs of any intense or sustained support.

Again, the Total Goals betting shows that support for Overs was most intense after Oostende took a 2-0 lead which is not surprising. After that, the Goal line didn't go below Over/Under 5.00 again until the last

12 minutes play, so although there was a fifteen-minute spell during the second half where Overs barely decayed at all, this betting would not have been successful. There was some support again for Overs when the line moved below O/U 5.00, but again not heavy or sustained.

If there had been a sixth goal, then the long lack of decay during the second half may have raised higher levels of suspicions, but as most of the betting appears to be at least partially attributed to events on the field, and not totally successful, then in isolation this would be a match with fairly low-level concerns. It should be re-iterated, though, that only one operator's prices have been analysed, and no footage of the match has been found through open source.

Initial SPI Grading: 2

PINNACLE BETTING SUMMARY

Pregame had very low turnover, but tbh [to be honest] that is to be expected in a friendly match of this magnitude. Live had much more interest. It is kind of hard to reconstruct the line movement from the wagers alone, so I can't

really speak to the fact about the prices being far from the norm or not. I can however say that the majority of accounts that either won or lost 'medium' amounts on this match were Asian arbitrage accounts. Again, this would be the norm in a match such as this. We had no accounts that won significant sums on this match, nor did we see any accounts with a suspicious history.

Response from Belgian Police

The matches were effectively offered and bets were placed on them, but no irregular/suspicious betting patterns or players/online player accounts were noticed. Wagers and winnings were low.

MEDIA COVERAGE

11-8-2019 - Alexis Kougias accusations.

<https://www.sportime.gr/ael/kougias-gia-lamia-volo-apollona-larisas-panachaiki-ke-stimena/>

<https://www.sdna.gr/podosfairo/superleague/article/626535/karfia-koygia-gia-apollona-larisas-kai-lamia>

APPENDIX 8.

SURVEY OF IBIA MEMBERS

1. Approximately, how many (and what percentage) of the European club football matches that you offer betting markets on each year are friendly (non-competitive competition) matches?
2. Where do you get the data (teams playing, kick off time, players involved, etc.) used to provide betting markets for European friendly matches (if more than one is used then tick multiple boxes)?

Sold/provided by data Provider (it would also be helpful to know which ones)	Sold/provided by match/event organiser	Taken from website or other information channel	Other (please detail)

If more than one box is ticked, please give some indication of the overall amount of data provided/sold by each e.g., data provider 70%, event organiser 20%, website 10%.

3. Do you have any minimum data levels that you require before offering a European football club friendly match? If so, what are they e.g., must be sold/provided by a data provider using scouts and providing location of the event and teams playing?
4. Approximately what percentage of European friendly games you offer betting on are streamed/broadcast by you and/or the event organiser and allow a live video record of the action taking place and verifying the score etc.?

APPENDIX 9.

Gambling Regulator Survey

Q1. Betting on Friendly Football Matches

Are there any restrictions on your licensed betting operators offering betting markets on European football friendly (non-competitive) matches: Yes/No

If Yes, what are the restrictions

If No, do you have any specific integrity requirements around betting on football friendlies?

Figure 14.

Regulator	Restrictions on betting on friendlies	Specific friendly integrity requirements
Belgium - Gaming Commission	No	The Commission may prohibit betting if it is linked to fraud or proper conduct cannot be guaranteed.
Cyprus - National Betting Authority	No	There are no specific integrity requirements on betting on football friendlies.
Denmark - Gambling Authority	No	No, licence holders must mitigate the risk of a match being fixed and suspend the market where there is suspicious betting.
Finland - National Police Board	No	No
France - L'Autorité nationale des Jeux (ANJ)	Yes – No betting on club friendly matches. Permitted for national team matches, but only for the top 50 in the FIFA rankings.	N/A
Germany - Hesse Gambling Regulatory Authority	No	No, but the law prohibits betting on sports events exclusively involving minors or amateurs.
Great Britain – Gambling Commission	No	No, but guidance has been provided to betting operators which outlines how operators should manage risk around unregulated sporting events (including friendly matches).
Isle of Man - Gambling Commission	No	No
Ireland - Department of Justice	No	No
Malta - Gaming Authority	No	No

Q2. Licensing of Data Providers

Are the companies that sell data (e.g., on the teams playing, location, score/scorers and so) on European football friendly matches to your licensed betting operators also required to be licensed and regulated by you (e.g., as gambling software providers may be licensed and regulated) or any other national regulatory authority? Yes/No

If Yes, what is the form and scope of the licensing and regulation

If No, are you considering requiring that these data companies be licensed and regulated?

Figure 15.

Regulator	Licensing of data providers	If No, are you considering licensing
Belgium - Gaming Commission	No	No - the Commission does not have the competence to introduce such a licence; would need legislative amendment.
Cyprus - National Betting Authority	No	No
Danish - Gambling Authority	No	No
Finland - National Police Board	No	No
France - L'Autorité nationale des Jeux (ANJ)	No	No
Germany - Hesse regulatory authority	No	No - only betting operators are required to be licensed, not their suppliers.
Great Britain – Gambling Commission	No	No
Isle of Man - Gambling Commission	No	No
Ireland - Department of Justice	No	Legislative proposals to modernise the licencing and regulation of gambling in Ireland are currently being developed. The sale of data to betting operators will be considered in that context.
Malta - Gaming Authority)	No	No
Netherlands – Gambling Authority	No	No
Poland	No	There is no knowledge about selling data on European football

Q3. Sale of Friendly Football Match Data for Betting

Are there any betting regulatory or integrity restrictions on your national football leagues and clubs from selling the data on their friendly football matches (either directly or through a third-party data supplier) to:

- Betting operators licensed in your country? Yes/No
- Betting operators licensed in any other European country? Yes/No
- Betting operators licensed in any non-European countries with robust betting licensing and regulation e.g., Australia, states in America? Yes/No
- Betting operators licensed in poorly regulated non-European countries e.g., Curacao? Yes/No
- Betting operators with no licensing at all (e.g., illegal)? Yes/No

If there are no restrictions, what measures are in place to address any potential integrity issues, notably from the sale of such data to poorly or unregulated betting operators?

Figure 16.

Regulator	Restrictions on clubs/leagues selling data on friendly matches	If No, are any integrity measures in place
Belgium - Gaming Commission	No to all questions.	Article 4 §2 of the Gambling Act states that it is prohibited to facilitate unlicensed betting. Selling data to unregulated betting operators would constitute a violation of this rule (up to three years imprisonment and fine).
Cyprus - National Betting Authority	No to all questions.	None.
Danish - Gambling Authority	No to all questions. The Danish gambling legislation does not include any regulation of the examples set in the question. Sale of data for betting is not regulated in the Danish gambling legislation, nor in the match fixing regulations at the Danish NOC and Sports Confederation of Denmark.	Betting licence holders must mitigate the risk of a match being fixed and suspend the market where there is suspicious betting.
Finland - National Police Board	No to all questions.	No, but sport governing bodies might have in their own rules and regulations.
France - L'Autorité nationale des Jeux (ANJ)	No to all questions.	ANJ fights illegal betting by closing illegal websites to French gamblers.
Germany - Hesse regulatory authority	No to all questions.	This is the responsibility of sports bodies.
Great Britain – Gambling Commission	No to all questions.	The Gambling Act 2005 does not provide the Commission with any statutory powers over football leagues and clubs regarding their commercial activities. This question is more relevant for football stakeholders.

APPENDIX 10.

SURVEY OF SPORTS BETTING DATA PROVIDERS ON EUROPEAN CLUB FOOTBALL FRIENDLIES

1. Approximately, how many (and what percentage) of the European club football matches that you offer data on each year are friendly (non-competitive competition) matches?
2. Where do you get the data (teams playing, kick off time, players involved, etc.) used to provide data on European friendly matches (if more than one is used then tick multiple boxes)?
 - a) Scout
 - b) Club(s) website
 - c) Other Internet sources
 - d) Match agents
 - e) Club officials
3. Do you agree contracts with football governing bodies, event organisers and/or sports clubs to permit you to collate and sell data related to all of the football matches that you sell data for covering:
 - a) Competitive football matches; and
 - b) Non-competitive (friendly) football matches

Please provide details of the process and what football stakeholders you engage with.

4. Do you have any minimum levels of information that you require before selling fixtures on European football club friendly matches to your clients? If so, what are they e.g., kick-off time, venue, team line-up, etc?
5. Approximately what percentage of European friendly games that you offer betting data on are streamed/broadcast by clubs or the event organiser and allow a live video record of the action taking place and to verify the score etc.?
6. What control procedures do you employ to ensure that any data collected (and then sold) is robust and reliable for:
 - a) Competitive football; and
 - b) Non-competitive football
7. How many betting operators do you sell football data to and where are their business operations principally based (it is understood that many operators are global, especially online, but where is the headquarters) – please state in approximate number and continental geographical location (Europe, Africa, Asia, North America, South America, Oceania)
8. Do you place any requirements on the probity of your betting operator customers and the sale of data to them e.g., are there any betting operators that you wouldn't sell data to (and why?), and if so, how do you make checks in that regard?
9. Do you provide integrity monitoring services on European club football friendlies for any organisation? If so, are you able to provide details of the organisation and scope of games?
10. Do you advise your betting operator clients of match information and the source and strength of your data? If so, what does that cover e.g., match day teams, ground location, live stream available, and is that data different for:
 - a) Competitive football matches; and
 - b) Non-competitive football matches

APPENDIX 11.

IBIA Data standards

Data standards: procedures for the collation of sporting data for betting Introduction

The provision and use of sporting event data has become an increasingly important aspect of the regulated betting market, notably driven by global consumer demand for product choice and access. The security and integrity of that data has correspondingly taken on increased significance. The International Betting Integrity Association (IBIA), which represents many of the largest regulated sports betting operators in the world, believes that ensuring the reliability and credibility of sporting event data is of paramount importance. There is a clear benefit for every party involved in the data supply chain in ensuring that such data is a product of high levels of accuracy and transparency.

Following discussions with stakeholders, and in acknowledgment of a general lack of formal regulation and licensing in aspects of the data collation and supply chain, IBIA has determined to promote a data collation process that endorses and verifies a set of minimum standards. IBIA believes that this is an effective means of achieving an approach which best serves to protect the integrity of sport, its data, betting markets generated by that data and consumers enjoying those products. No data approach is infallible or immune from potential corruption, but measures can and should be taken to guard against such illicit activity and effective controls can minimise the associated risks. IBIA has therefore set out a range of data standards and procedures in this document, which it invites interested parties to adopt and to demonstrate their commitment to.

Key Protocols

Core principles

Any sporting event data used for betting will be collated and offered in a manner that is:

- Accurate, reliable and transparent
- Responsibly sourced and minimises risk; and
- Protects against criminality or misconduct
- Personnel vetting and training

It is vitally important to verify the probity and knowledge level of the individual/s sourcing data to ensure that any data collation meets a high threshold of accuracy, reliability and transparency. As a minimum, the following personnel recruitment and training protocols should be in place.

- a) Any persons involved in the collation of sporting event data must be at least 18 years old.
- b) The identities of those involved in the data collation process should be properly verified via official documentation (e.g., ID, proof of address) and interview (including video conferencing).
- c) Additional background checks should be made to ensure that there are no potential conflicts of interest or probity issues e.g., also working for other parties in the data supply chain.
- d) Prior to being operational, the data collation individual should pass a live training programme

which consists of at least one full game in the respective sport/s they will cover.

- e) Prior to being operational, all persons involved in the data collation process should have demonstrated a sufficient knowledge of the business language used and the sport/s involved to ensure effective communication and awareness of processes and policies.
- f) Data collation, communication and integrity protocol training should be provided prior to any person involved in the data collation process being operational; where a person has been inactive for 90 days or more, appropriate operational retraining is encouraged.
- g) All persons must also be trained in how to identify and report integrity concerns, either in relation to the data collation operation or match/competition/club integrity issues.
- h) Breaches of any data collation protocols should be met with suitable disciplinary measures.

Data collation process

All relevant parties should recognise a duty of care to ensure that any data collated and distributed is done in a transparent manner and that any data is robust, accurate and reliable.

- a) The location, date/time and participation of those involved in a sporting event being offered should be confirmed by a reliable source at least 48 hours prior to matchday.
- b) Further checks on the veracity of the information on the sporting event on which data will be collated should be undertaken on the day of the event.
- c) The data supplier and its betting operator clients are encouraged to interact, and where necessary conclude contractual provisions, regarding the source, accuracy and reliability of any data, and which may include issues such as:

i. How that data has been generated e.g., a person at the venue or TV pictures; and

ii. The speed, latency and process for transmission of that data.

d) Sporting event data should be collated on a secure device with compatible software and with clear policies on terms of use to minimize the potential risk of manipulation.

e) All sporting events covered by data collectors should have post-match quality assurance checks conducted against key performance indicators, and with suitable remedial measures taken.

f) The data collection database should provide visibility on which user created/edited/deleted

data for every event and when, and all data should be securely maintained for at least 3 years.

Data integrity and reporting

Upholding and protecting the reliability and credibility of sporting data is of paramount importance.

- a) A detailed risk assessment should be conducted on any sporting events and competitions on which data is collated, with ongoing monitoring and review.
- b) All persons directly involved in the

operation of collating, verifying and communicating sporting event data for betting should have suitable integrity and probity obligations placed in their contractual engagement terms and conditions.

c) Where any data integrity issues are identified, all parties in that data supply chain and any other relevant integrity stakeholders must be informed immediately, an investigation process conducted, and the results and remedial measures shared with those parties.

d) The data collection party will, in accordance with the respective law, agree to exchange information and engage in sporting and regulatory/law enforcement integrity investigations.

Auditing process and Kitemark

All parties involved in the collation of sporting event data, which may be distributed to regulated betting companies, may apply for the IBIA approved Data Standards Kitemark.

a) Only those parties that meet and maintain the required standards set out in this document will be allowed use the approved Kitemark and for the duration that IBIA determines.

b) IBIA will appoint an independent auditor/s to assess if a party meets the required data standards; those standards and this document may change as IBIA determines.

c) The party applying for the Kitemark will agree to adhere to any assessment process set out by IBIA and its specified auditor/s and will meet any costs related to that process.

d) That may include an additional assessment by the auditor where integrity issues and/or potential breaches of these data collation standards are identified.

e) Auditing will take place annually, unless otherwise determined by IBIA, and any party meeting the requirements may be listed on the IBIA website and in any related documentation.

f) All data provided to IBIA and its auditor will be retained in the strictest confidence

and will not be circulated outside of those bodies unless or until agreed with the audited party; a Non-Disclosure Agreement (NDA) will be signed where requested and deemed appropriate.

g) Any party passing the audit may be invited to participate as a member of the

IBIA Data Standards Steering Group; IBIA may invite other parties to participate as it determines.

h) Applications to engage in the data standards auditing process should be sent to info@ibia.bet.



APPENDIX 12.

IBIA Betting alerts by type and country

Country	2017	2018	2019	2020	Q1 2021	Q2 2021	Q3 2021	Total	Competitive	Non-Competitive	Non-Competitive Percentage
Brazil	0	3	3	5	0	4	2	17	16	1	6%
UK	4	1	8	2	0	0	1	16	16	0	
Russia	2	2	2	4	3	1	1	15	15	0	
Ukraine	3	5	2	3	0	0	0	13	6	7	54%
Vietnam	0	0	0	10	3	0	0	13	10	3	23%
Greece	6	3	1	2	0	0	0	12	11	1	8%
Bulgaria	2	3	2	2	1	0	1	11	11	0	
Romania	5	2	3	0	0	0	0	10	10	0	
Spain	2	7	0	0	0	1	0	10	10	0	
Serbia	5	1	1	1	0	0	0	8	7	1	13%
Czech Republic	1	2	1	2	1	0	1	8	6	2	25%
Uzbekistan	1	3	0	2	0	0	1	7	7	0	
Georgia	0	0	2	3	1	1	0	7	4	3	43%
Turkey	0	2	0	4	0	0	0	6	0	6	100%
Venezuela	1	0	0	5	0	0	0	6	6	0	
Kazakhstan	0	0	0	1	0	1	4	6	6	0	
India	0	1	3	0	1	0	0	5	3	2	40%
Croatia	0	1	0	1	0	2	1	5	4	1	20%
Canada	1	3	0	0	0	0	0	4	4	0	
Armenia	0	0	2	2	0	0	0	4	1	3	75%
Laos	0	0	1	3	0	0	0	4	4	0	
Macedonia	0	3	0	1	0	0	0	4	4	0	
Moldova	2	0	1	0	0	1	0	4	4	0	
Ireland	0	1	2	0	0	0	1	4	4	0	
Portugal	3	0	0	0	0	0	0	3	3	0	
Indonesia	0	3	0	0	0	0	0	3	3	0	
Peru	0	1	0	2	0	0	0	3	3	0	
Kosovo	0	0	1	2	0	0	0	3	3	0	
Cyprus	1	0	1	0	1	0	0	3	3	0	
Albania	1	1	0	0	0	0	0	2	2	0	
Sweden	0	0	2	0	0	0	0	2	2	0	
Cameroon	0	0	2	0	0	0	0	2	2	0	
Italy	1	0	1	0	0	0	0	2	2	0	
Tajikistan	0	0	0	2	0	0	0	2	1	1	50%
Malta	0	0	1	1	0	0	0	2	2	0	
Nigeria	0	0	1	0	0	0	1	2	2	0	
Netherlands	0	0	0	0	1	1	0	2	2	0	
Israel	0	0	0	0	0	1	1	2	1	1	50%
Ghana	0	0	0	0	0	0	2	2	2	0	
Algeria	0	0	0	0	0	1	1	2	2	0	
Austria	1	0	0	0	0	0	0	1	1	0	
Estonia	0	1	0	0	0	0	0	1	1	0	
Lithuania	1	0	0	0	0	0	0	1	1	0	
Norway	0	1	0	0	0	0	0	1	1	0	
Slovakia	0	1	0	0	0	0	0	1	1	0	
Kyrgyzstan	1	0	0	0	0	0	0	1	1	0	
El Salvador	1	0	0	0	0	0	0	1	1	0	
Bolivia	0	1	0	0	0	0	0	1	1	0	
Germany	0	0	1	0	0	0	0	1	1	0	
China	0	0	1	0	0	0	0	1	1	0	
Ecuador	0	0	1	0	0	0	0	1	1	0	
Slovenia	0	0	1	0	0	0	0	1	1	0	
Iran	0	0	1	0	0	0	0	1	1	0	
Bosnia & Herzegovina	0	0	1	0	0	0	0	1	1	0	
Burundi	0	0	0	1	0	0	0	1	1	0	
Tunisia	0	0	0	0	0	1	0	1	1	0	
Gibraltar	0	0	0	0	0	1	0	1	1	0	
Total	45	52	49	61	12	16	18	253	221	32	13%

Key

 EU 27

 New country added since Q1 2021 meeting

 Includes friendly match (this many not be all of the number listed - see non-competitive column)

Country	2017	2018	2019	2020	Q1 2021	Q2 2021	Q3 2021	Total Non-Competitive
Ukraine	2	2	0	3	0	0	0	7
Turkey	0	2	0	4	0	0	0	6
Vietnam	0	0	0	3	0	0	0	3
Armenia	0	0	2	1	0	0	0	3
Georgia	0	0	0	2	1	0	0	3
Czech Republic	0	0	1	1	0	0	0	2
India	0	0	2	0	0	0	0	2
Greece	0	0	0	1	0	0	0	1
Brazil	0	0	0	1	0	0	0	1
Serbia	0	0	1	0	0	0	0	1
Croatia	0	0	0	1	0	0	0	1
Tajikistan	0	0	0	1	0	0	0	1
Israel	0	0	0	0	0	0	1	1
Total (percentage competitive v non-competitive)	2 (4%)	4 (8%)	6 (12%)	18 (30%)	1 (8%)	0 (0%)	1 (6%)	32 (13%)

PROJECT INTERVIEWS

The following people were interviewed for this report. Some people were interviewed on the basis of anonymity. The report also drew on interviews by the main author from the CIES FIFA Scholarship, "A Friendly Business? A critical evaluation of the globalisation and commercialisation of the preseason friendly (CIES: 2019).<https://www.cies.ch/en/cies/news/news/article/a-friendly-business-publication-of-cies-new-book-edited-by-author-and-journalist-steve-menary/>

Surname	Christian name	Organisation
Angeli	Chryso	Cyprus Police
Arias Grillo	Rodrigo	FIFA
Asgar	Tony	Revolution Sports
Astley	Tom	Football Association (England)
Bahrs	Michael	Bochum Police
Bailey	Darren	Charles Russell Speechlys
Baranca	Francesco	Ukrainian Association of Football
Beiso	Dennis	Gibraltar Football Association
Bielefeld	Alexander	FIFPRO
Blume	Marco	Pinnacle
Bolingbroke	Rupert	Hong Kong Jockey Club
Bowers	Alec	Starlizard
Brickell	Adam	Skybet
Buesching	Dennis	Match IQ
Burton	Stephen	Genius Sports
Carpenter	Kevin	Captivate Legal & Sports Solution
Casteels	Christine	Belgian Federal Police

Surname	Christian name	Organisation
Cavoj	Jakub	Slovak Football Association
Celestino	Angela	UEFA
Chignell	Tom	Hong Kong Jockey Club
Constantin	Pompiliu-Nicolae	National University of Physcial Education & Sport (Romania)
Cullis	Simon	STATS Perform
D'Orsy	Sergio	Europol
De Gendt	Thibaut	Royal Belgian Football Association
de Goeij	Peter-Paul	NOGA
Dogge	Jan-Peter	KNVB (Netherlands)
Eichenberger	Stephanie	FIFA
Fernandes	Cassandra	GLMS
Forrest	David	University of Liverpool
Gomersall	Sam	Pinnacle
Grabher	Markus	Asian Monitor
Hagemann	Antonia	SD Europe
Harvey	Andy	Swansea University (Wales)
Hendrich	Jiri	Football Association of the Czech Republic
Henry	Matt	Consultant (UK)
Higgins	Tony	FIFPRO
Hines-Randle	Andy	Badminton World Federation
Hollerer	Thomas	Österreichischer Fußball-Bund (Austria)
Horne	Brian	Sporting Events (UK)
Ikonen	Jouko	FINCIS
Jarosz	Olivier	Club Affairs
Kerr-Cumbo	Renzo	MCAST
Kinga	Warda	Malta Gaming Authority
Korhonen	Dan	Svenska Spel
Leyland	Paul	Regulus Partners
Lorcan O Laoire	Ronan	UNODC
Lord	Fred	ICSS
Lorenzo-Mena	Afredo	Royal Spanish Football Federation
Mace	Tom	Sportradar
Marinelli	Claudio	Interpol
Marsh	Jake	STATS Perform
Masrhbaum	Eddie	Quest
Mavrotas	Georgios	Secretary General for Sport (Greece)
Mena	Javier	Consultant (Spain)
Mifsud	Joseph	Judiciary of Malta

Surname	Christian name	Organisation
Moriconi	Marcelo	ISCTE
Moritzer	Severin	Play Fair Code
Mula	Herman	Malta Football Association
Neuberger	Julian	Match IQ
Ondigo	Moses	Citybet
Paterson	Ben	Genius Sports
Pearman	Lorraine	UK Gambling Commission
Phillips	Alex	Consultant (UK)
Poledica	Mrko	Serbian Players Union
Rasmussen	Chris	Consultant (Denmark)
Raudenski	Nick	UEFA
Romano	Ivo	Consultant (Italy)
Rubicsek	Norbert	RC3 & Partners
Safami	Olawale	Nairabet
Salazar-Mendes	Pablo	Europol
Savvides	Charis	Cyprus Committee of Ethics & Safeguarding in Sport
Segalin	Corentin	ARJEL
Senel	Tolga	Consultant (Turkey)
Sheikh	Affy	Starlizard
Soares	Rute	Federação Portuguesa de Futebol
Stefanovic	Dejan	Slovenian Players Union SPINS
Tabone	Franz	Malta Football Association
Theodorou	Nikolaos	Greek Ministry of Sports & Culture
Uddeholt	Jakob	Swedish Sports Confederation
Vagelis	Kim	GLMS
Vatkov	Rumen	Consultant (Bulgaria)
Veenstra	Tjeerd	KNVB (Netherlands)
Venn	Vincent	UEFA
Verschuuren	Pim	IRIS
Warners	Chiel	Dutch National Platform
Wassenaar	Bart	Dutch Tax and Customs Administration
Waters	Emil	Norwegian Football Federation
Weston	Louise	Outer Temple Chambers
Zerafa	Antonio	Malta Gaming Authority
Zubic	Evgheni	Football Association of Moldova

Note: Employment at time of project interview.

Some players & other individuals were interviewed on condition of anonymity.





 www.unrf.ac.cy/projects-item/combating/
 info@unrf.ac.cy