



EVIDENCE-BASED PREVENTION OF SPORTING-RELATED MATCH-FIXING

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



# **FIGHT AGAINST SPORTING-RELATED MATCH-FIXING**

## **Proposals for a French National Action plan**

*January 2022*

## About the project

### EPOSM

The EPOSM (Evidence-based Prevention of Sporting-related Match-fixing) project is a collaborative partnership between academic and non-academic partners, co-funded by the Erasmus+ Programme of the European Union. This project studies sporting-related match-fixing in different sports across the EU. It started on 1 January 2020.

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### About the partners

The project is coordinated by Ghent University, Belgium.

The French Institute for International and Strategic Affairs (IRIS) is one of the non-academic partners. IRIS was responsible for the data collection and knowledge dissemination in France.

Other project partners are

- Utrecht University (The Netherlands);
- Play Fair Code (Austria);
- Croatian Olympic Committee (Croatia);
- Lausanne University (Switzerland);
- Loughborough University (The United Kingdom);
- Panathlon International (Belgium);
- International Centre Ethics in Sport (ICES) (Belgium);
- Counter Sport Corruption Foundation for Sport Integrity (CSCF) (The Netherlands);

Please note that the Council of Europe is an associated partner organization of the EPOSM project.

### EPOSM study in France

In France, the project focuses on three sports: football, tennis, and handball. Nevertheless, the study has been widely shared across the sport movement. In the framework of the questionnaire, responses from badminton, basketball, judo and swimming were collected, although they were in the minority.

## Executive Summary

The manipulation of sports competitions is a complex, transnational and multi-faceted threat to the integrity of sport. In recent years, several scandals have particularly agitated the sports news: Calciopoli, Calcioscommesse, or Bochum.

With their media coverage, the understanding of the stakes linked to manipulations of sport and the increase of financial stakes, this scourge has finally appeared as a real threat in the sports field since the turn of the 2010s. Affected by these scandals, federations and clubs have been obliged to react and to deploy an arsenal of important measures to prevent, train, raise awareness and if necessary, punish.

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However, sport stakeholders do not give the same attention and same investment to all types of manipulations. Indeed, if clubs, federations, leagues or even unions have been able to develop over the past decade solutions to prevent match fixing linked to sport betting, notably because of the risks (legal, financial, criminal, reputational, etc.) that they ran, it is clear that manipulations linked to sports stakes appear to be a more marginal concern. Yet, this form of match-fixing appears to be particularly important because it involves notions of ethics and moral commitment that are essential in sport. Indeed, it is by consolidating these bases and stimulating moral judgment that other integrity breaches could be avoided.

However, several exploratory studies have shown the importance of this phenomenon, which has been ignored for too long in the sports world. In 2019, the University of Ghent conducted a pioneering study on the subject. In order to confirm the result and to have a European point of view, Ghent University decided to launch an Erasmus + project. You will find below in this report the results. At the end of this document, you will also find few recommendations headed for French sport stakeholders. Three special focuses will be made on football, tennis and handball.

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## 1. INTRODUCTION

Sometimes eclipsed by the doping phenomenon, match-fixing is now considered as one of the main threats in contemporary sport. Linked to the globalization of sport, its increasing media coverage and the exponential financial stakes involved, the problem of match-fixing is today taken into account seriously by national and international sports institutions (FIFA, IOC, IFT, etc.) but also, by national and supranational non-sports organisations. Indeed, since the 2000s, the fight against match-fixing is no longer seen through a single national prism but, on the contrary, its international character is constantly highlighted. Moreover, key stakeholders have understood that this scourge goes beyond sport. Henceforth, the European Union, UNODC, Council of Europe, Interpol and many others are particularly active on this issue.

However, stakeholders pay mainly attention to betting-related match-fixing. In the past ten years, leagues and federations realized how important what the threat and have implemented measures to fight betting in sport. Despite this phenomenon has a devastating impact on the attractiveness and integrity of sport, it only represents one type of match-fixing among many others. Indeed, the issue of sporting-related match-fixing is only marginally addressed. The EPOSM project precisely meets this objective.

The EPOSM (Evidence-based Prevention of Sporting-related Match-fixing) project is a collaborative partnership between academic and non-academic parties, co-funded by the Erasmus+ Programme of the European Union and studies sporting-related match-fixing in different sport disciplines across the EU.

The Erasmus+ project EPOSM has 3 main goals:

- Raising awareness about the prevalence of sporting-related match-fixing;
- Stimulating moral judgment regarding the fact that sporting-related match-fixing is wrong, as it threatens the credibility and attractiveness of sport.

- Sharing and transferring knowledge on sporting-related match-fixing through the organisation of a training procedure.

In France, the project focuses on football, tennis, and handball. Nevertheless, the study was shared with the sport movement. In the framework of the questionnaire, responses from badminton, basketball, judo and swimming were collected, although they were in the minority.

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IRIS developed this French National Action Plan ([www.eposm.net](http://www.eposm.net)) for the main stakeholders in French sport, particularly in three disciplines: football, tennis and handball.

IRIS team would like to take this opportunity to sincerely thank each participant involved in the discussions, reflections, focus group and events. This food for thoughts was really helpful for producing this document.



## 2. THE EPOSM PROJECT

### 2.1 Project overview

The EPOSM “Evidence-based Prevention of Sporting-related Match-fixing” is co-funded by the Erasmus+ Program of the European Union.

From January 2020 to December 2021, the collaborative partnership between European academic organizations and expert partners assessed sporting-related match-fixing in various sports disciplines on a European basis and pursues the following objectives:

- Raising awareness about the prevalence of sporting-related match-fixing;
- Stimulating moral judgment, assuming that sporting-related match-fixing is a clear failure threatening the credibility and attractiveness of sports;
- Sharing and transferring knowledge on sporting-related match-fixing through the organization(s) of a training procedure.

Coordinated by the Ghent University, this project is made up with the Croatian Olympic Committee, Panathlon International, Utrecht University, the CSCF (Foundation for Sports Integrity), University of Lausanne, the ICES (International Center Ethics in Sport), Loughborough University, IRIS (Institut de relations internationales et stratégiques), Play Fair Code and the Council of Europe as an associated partner, take part in the project.

In the first phase of the project, theoretical principles were derived through the collection and dissemination of an international and target group-specific survey on the subject of match-fixing in general, and sport-related manipulation, in particular. The survey results are displayed in section 2.2.

As a result of the findings, individual criteria for the National Action Plans and awareness-raising workshops were generated by the project partners under the guidance of Panathlon International. Based on these criteria, the project



partners developed national action plans and workshops for their respective countries and the sports disciplines selected.

## 2.2 The EPOSM Survey for France

In order to better understand the phenomenon, a survey was created by Ghent University and was broadly disseminated during the first year of the EPOSM project among the partners. To study the phenomenon in France, the EPOSM project focuses on three sports: football, tennis, and handball.

While football and tennis are common sports with other countries represented in the EPOSM consortium, handball was chosen for France because of a match-fixing scandal that has occurred in 2012 ("the Karabatic case"). Following this major scandal involving famous international French players betting on their own sport and match, key stakeholders in this sport (league, federation and union) have worked a lot on this issue in order to preserve the future of handball. 10 years after this scandal, it seemed interesting to see how things had evolved.

The EPOSM questionnaire was shared with all the sport movement through e-mails, phone calls, social networks, video. In the framework of the questionnaire, responses from badminton, basketball, judo and swimming were collected, although they were in the minority. Many efforts were done in order to gather the largest number of answers. First, we contacted federations in a complicated context (lockdown in France due to the pandemic).

We therefore communicated widely via social networks to obtain feedback, through messages (May, June) or a video (July). In September, we contacted again federations, leagues, clubs and syndicates and, at that time, we put the emphasis back on communication, both institutional and personal through our contacts, but also digital via social networks. We sent a last reminder to every contact during October in order to collect some news testimonies.

In total, in November 2020, 2 475 people started the survey and 359 of them fully completed the questionnaire (response rate = 14,5%). We decided to retain the partially completed questionnaires that were completed for 37,5% or more, as questionnaires with less answers had no substantial value.

Subsequently, we checked the main sport disciplines of the respondents. When there was a missing value for the question examining the main sport discipline, the respondent was removed from the sample considering that the main sport discipline was a vital information. Lastly, we checked the age of the respondents. All respondents under the age of 18 were removed from the sample, regarding institutional ethics standards.

Regarding the results, some key facts could be raised:

- **60 respondents** reported (proposed) **incidents of match-fixing**;
- **24 were directly approached**: 14 in football and handball, 5 in tennis and 5 in other sports;
- Respondents have been approached when **they were young** (around 23 years old);
- **15 cases were linked** to non-betting-related motivation. They all happened at **amateur level**;
- **14 cases happened** in France;
- **Athletes and referees** are most likely **to be targeted** in such situations (93%), in 60% by the opponent;
- On these 15 cases, **3 players/referees consented with the proposal to fix the match**;
- **30 never reported this approach** or did not report it to their authorities;
- **99 people consider that their club does not pay enough attention** to this risk and 96 do not know if their club pays attention to this risk.



Beyond the results of this survey, few conclusions can be drawn. To the contrary of betting-related match-fixing, sporting-related manipulation have attracted less mediatic and scientific interest, although they may be prevalent within sporting contexts. Hence, the dissemination of the questionnaires in France was crucial. It aimed at better understanding the reality of manipulation at local level. Although the sample size and representativity is limited, three major conclusions can be drawn from this research.

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First of all, thanks to this study, it is clear to note **that competition manipulation in France exists** and is, one more time, proven. 16,7% of the respondents either personally know someone who has been approached by a match-fixer or have been personally approached. Given the fact that the vast majority of the respondents are involved at amateur level (70,8%) and given the potential social desirability trends in the responses, it can be considered as an important proportion. In consequence, faced with this curse, **it is crucial that sport governing bodies, both public and private, must not neglect this phenomenon and respond with the appropriate measures.**

Secondly, there is still **room for improvement about reporting**. Indeed, out of the sixty approaches identified, 30 people never reported this approach or did not report it to their authorities. This figure demonstrates that whistleblowing is still a key issue. Awareness-raising actions on the importance of whistleblowing and communication actions on the existing mechanisms seem to be essential.

Moreover, it could also be interesting for further study, to question the reasons for this lack of report.

Thirdly, of the 272 players still active, ninety-nine responses mention insufficient prevention within clubs and 96 were uncertain about this prevention. In order words, 71% of the respondents who still play in clubs note a lack of information provided by their own clubs each season. **Consequently, it is urgent to consider that a real strategic axis of information dissemination, awareness-raising** and training can be carried out on this subject within the institutions.

## 2.3 The EPOSM survey in Europe

At the European level, **5,014 responses** were obtained from seven countries (Austria, Belgium, Croatia, France, the Netherlands, Switzerland and the UK).

The sports surveyed were the following:

COUNTRIES	SPORTS STUDIED		
Austria	Football	Tennis	Handball
Belgium			Basketball
Croatia			Basketball
France			Handball
The Netherlands			Hockey
Switzerland			Basketball
United Kingdom			Cricket

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Regarding the results, **some key information about the respondent panel:**

- **Football is the most represented sport** (58%), followed by tennis (14%);
- Most of the respondents **were man** (84,2%) with almost all responses in sports such as cricket (97,6%) and football (91,7%);
- The **average age of respondents is 40.5 years** and they have been involved in their sport for almost 23 years, on average;
- **Most of the respondents were athletes** (59,5%) with, however, an interesting participation of members of the refereeing body (17,2%);
- The **majority of respondents play at amateur level** (73.1%); however, it is interesting to note that 11% of them are professionals.

After studying all the responses, Ghent University was able to draw several conclusions<sup>1</sup>:

<sup>1</sup> Please find the final presentation of the EPOSM project, International Symposium, November 2021, [https://580c85e0-750c-4393-90cf-323d9a94f8b0.filesusr.com/ugd/ed0a75\\_ac1e5eb5bdab4d1996799ba8757b847d.pdf](https://580c85e0-750c-4393-90cf-323d9a94f8b0.filesusr.com/ugd/ed0a75_ac1e5eb5bdab4d1996799ba8757b847d.pdf)



- **Nearly 20%** of the respondents has been confronted **with direct or indirect match fixing proposals**.
- Of those who were approached directly, **68%** were approached to manipulate matches because of the sporting stakes, either to avoid the relegation of a player or a club or to enable them to win the championship;
- While the **majority of these cases took place at the amateur level** (76.8%), these approaches are also found at the professional (5.8%) and semi-professional (17.4%) levels.
- About the **whistleblowing**, the results at European level are the same as it was for France. Almost **half of those (48%) aware of manipulation has never reported** this information.
- Concerning prevention, while 37% of those still involved in a club consider that their club/league/federation is vigilant on the issue of match-fixing, **27% consider that this is not a subject of vigilance for them at all**. 34% of respondents do not know.

## 2.4 The building of a national action plan

In order to build a relevant and useful national action plan, IRIS team built its reflection on three pillars:

- desk research on the existing mechanisms to fight against match-fixing in France;
- analysis of national and European EPOSM results;
- interviews with relevant stakeholders within the French sport world.

Although the EPOSM project planned to draw up an action plan for each sport, it seems more relevant to realize only one report considering the fact that the problems encountered by football, tennis and handball were, at some point, the same. This is why this summary document compiles all the information, presenting general recommendations to the 3 sports (and even beyond) before formulating practical recommendations for each of the 3 sports.

IRIS interviewed members of the following sporting entities:

- French Ministry of Sport ;



- French football federation ;
- French tennis federation ;
- French handball federation ;
- Professional football League ;
- Union nationale des footballeurs professionnels ;
- Association des Joueurs professionnels de handball ;
- La Française des jeux (French Lottery) ;
- Autorité nationale des Jeux ;
- Formers or actual athletes;
- Other sport federations;
- Sport journalists;
- Experts on match fixing;
- Experts on integrity in sport.

The opinions of experts have not been reported word by word but translated into a narrative framework. For reasons of confidentiality, some interviews are not included in this list. IRIS team would like to take this opportunity to sincerely thank each participant involved in the discussions, reflections and help in producing this document.

It should also be noted that despite several attempts to interview other key stakeholders, no feedback could be obtained. In order to compensate this lack, IRIS team was able to find some additional answers during desk research and new interviews.

### 3. MATCH-FIXING IN FRANCE

France seems to be a country rather well protected against match-fixing. Indeed, although several major cases of match-fixing have occurred in previous years in Italy, Austria and Belgium for example, the French championships in many sports seem to have been spared for the moment.

This can be analysed through several elements:

- On one hand, there is currently a real complementarity between the different actors working on the issue of manipulation. This complementarity and exchange of information have been further strengthened by the creation of the national platform since 2016. In addition to identifying alerts, the parties are informed of suspicions, ongoing investigations and threats that may occur in sport and not only in the discipline.
- On other hand, an importance case happened in 2012: the Karabatic case. Considering the popularity of the people involved (French national top handball players), France sports realize it vulnerability. Following this case, sport leagues and federations (and not only handball) reinforced awareness, training and also whistleblowing process.

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#### **The Karabatic Case**

In the 2011/2012 season won by Montpellier Agglomération Handball, this club lost surprisingly a match against Cesson Rennes MHB, a club that was fighting for staying in the elite division.

Four days after this loss, the Française des Jeux (FDJ) (French national lottery) informed the authorities that massive bets had been recorded and that they were abnormally high in relation to the expected stakes of this game. In addition, FDJ noted two key elements: these bets were concentrated on some very important bets and all of them were taken in all around Montpellier. 80,000 euros were recorded, giving them a profit of 200,000 euros.

After this alert, the police launched interviews and perquisitions.

Many players were remanded in custody, including the Karabatic brothers, stars of the sport in France and around the world. Seventeen people were indicted.

The trial took place in 2015 and the appeal in February sentenced fourteen defendants to fines (from 10,000 to 40,000 euros) and suspended prison sentences.

However, it should be noted that the issue of match-fixing is almost exclusively considered, in France, through the prism of sports betting.

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However, a sporting-related match-fixing case also made the news in French football in 2014. Nîmes Olympique club, through the voice of its presidents, has asked to several other clubs to "slow down" in order to help them to remain in Ligue 2 (second top division).

When the case became public, the club has been demoted to the National (3<sup>rd</sup> division) by the Professional League, and the former owners of the club have been convicted, along with six other people involved in these fixings. The two former owners were sentenced for corruption in 2020.

However, it is interesting to note that despite the fact we talk about football (really popular sport in France), the fact that happened few years ago (so you cannot pretend it was long time ago) , and the conviction of the people involved, this affair is not very present in people's minds and thoughts.

Compared to the Karabatic case, only few journalists talked about this case and what it told you about integrity in sport.

Moreover, even today, we find mentions of this affair under the vocabulary "arrangement" and not necessarily under the terms "corruption", "manipulation", "match-fixing".

## 4. LEGAL FRAMEWORK ABOUT MANIPULATION OF SPORTS COMPETITIONS IN FRANCE

In this section, we provide a review of the most important legislative tools against match manipulation at international and national level.

### 4.1. Fight against manipulation of sports competition at international level:

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#### 4.1.1. The Convention on the Manipulation of Sports Competitions - the Macolin Convention

The Macolin Convention<sup>2</sup> is a legal instrument and the only rule of international law on the manipulation of sports competitions. It requests public authorities to co-operate with sports organisations, betting operators and competition organisers to prevent, detect and sanction the manipulation of sports competitions. It proposes a common legal framework for an efficient international cooperation to respond to this global threat. This Convention entered into force on 1 September 2019. It has been ratified by Greece, Italy, Norway, Portugal, the Republic of Moldova, Switzerland and Ukraine. It has been signed by 30 other European States and by Australia.

Although the Convention was officially signed by France on 02 October 2014, it has still not been ratified. Yet, during the preparatory phase of the Convention, France was one of the most dynamic countries and submitted numerous proposals. It is, today, one of the most advanced countries in this field, thanks in part to the cooperation of many national actors and the creation of the national platform for the fight against the manipulation of sports competitions on 28 January 2016.

The creation of this platform was one of the strategic stakes of the Macolin Convention (Article 13).

#### 4.1.2. IOC regulations

<sup>2</sup> Council of Europe Convention on the Manipulation of Sports competitions, Macolin, 18 September 2014, <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016801cdd7e>

As a key actor of sport, IOC published two documents relevant for our issue:

- Code of Ethics
- Olympic movement code on the prevention of the manipulation of competitions

Regarding the Code of Ethics<sup>3</sup>, 3 articles are particularly relevant:

- Article 7:

*"The Olympic parties shall commit to combat all forms of cheating and shall continue to undertake all the necessary measures to ensure the integrity of sports competitions."*

- Article 8:

*"The Olympic parties must respect the provisions of the World Anti-Doping Code and of the Olympic Movement Code on the Prevention of the Manipulation of Competitions."*

- Article 10:

*"Participants in the Olympic Games must not, by any manner whatsoever, manipulate the course or result of a competition, or any part thereof, in a manner contrary to sporting ethics, infringe the principle of fair play or show unsporting conduct."*

Regarding the Olympic movement code on the prevention of the manipulation of competitions<sup>4</sup>, articles 2.2 and 2.3 give us more details.

- Article 2.2

*"An intentional arrangement, act or omission aimed at an improper alteration of the result or the course of a sports competition in order to remove all or part of the unpredictable nature of the sports competition with a view to obtaining an undue Benefit for oneself or for others."*

<sup>3</sup> Code of Ethics, 2016, <https://stillmed.olympic.org/media/Document%20Library/OlympicOrg/IOC/What-We-Do/Leading-the-Olympic-Movement/Code-of-Ethics/EN-IOC-Code-of-Ethics-2016.pdf>

<sup>4</sup> Olympic Movement Code on the prevention of the manipulation of competitions, 2018  
<https://stillmed.olympics.com/media/Document%20Library/OlympicOrg/IOC/What-We-Do/Protecting-Clean-Athletes/Competition-manipulation/Code-Prevention-Manipulation-Competitions.pdf>

- Article 2.3

*"Providing, requesting, receiving, seeking, or accepting a Benefit related to the manipulation of a competition or any other form of corruption."*

#### 4.2. French laws

As proof of the growing importance of this subject and the concern of the public authorities to deal with this scourge, the last ten years have seen an increase in the number of laws in France aimed at strengthening ethics in sport. Although French law has been considerably strengthened in terms of the fight against match-fixing linked to betting, particularly since 2010, it should be emphasised that the manipulation of sports matches, independently of a betting logic, is also very present.

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For example :

- Law No. 2010-476 of 12 May 2010 on the opening up to competition and the regulation of the online gambling sector;
  - Law No. 2012-158 of 1 February 2012 aimed at strengthening sports ethics and athletes' rights;
  - Law n° 2012-158 of 27 November 2015 aimed at protecting high-level and professional athletes and professionals and to secure their legal and social situation;
  - Law No. 2017-261 of 1 March 2017 aimed at preserving the ethics of sport, strengthening the regulation and transparency of professional sport and improve the competitiveness of clubs.
- 
- Sport's Code:

Article R 131-3 of the Sport's Code requires sports federations seeking approval to adopt disciplinary regulations in accordance with the standard disciplinary regulations in Annex I-6 of the Sport's Code.

Article L 131-15-1 states that

*" The delegating federations, where applicable in coordination with the professional leagues they have created establish a charter of ethics and professional conduct in accordance with the principles defined by the charter provided for in Article L. 141-3.*

*They shall set up a committee with independent powers of assessment, empowered to refer matters to the competent disciplinary bodies and responsible for ensuring that this charter is applied and that the rules of ethics, professional conduct and the prevention and treatment of conflicts of interest are respected."*

- Penal Code

Several articles of the Penal Code refer to the prohibition of manipulation of sports events.

For example, Article 445-1-1 states that

*"Is punishable by five years' imprisonment and a fine of €500,000, the amount of which may be increased to twice the proceeds of the offence, the fact that anyone offers, without right, at any time, directly or indirectly, to a participant in a sporting event or horse race giving rise to bets, offers, promises gifts, donations or advantages of any kind, for himself or for another person, in order that this actor, by an act or abstention, should alter the normal and fair course of this event or race or because this actor, by an act or abstention, has altered the normal and fair course of this event or race.<sup>5</sup> "*

And Article 445-2-1 states that

*"Is punishable by five years' imprisonment and a fine of €500,000, which may be increased to twice the amount of the proceeds of the offence, for a participant in a sporting event or horse race giving rise to betting to solicit or accept from anyone, without right at any time, directly or indirectly, offers, promises, gifts, donations or advantages of any kind, for himself or for another person, to alter or to have altered, by an act or abstention, the normal and equitable course of this event or race<sup>6</sup>."*

<sup>5</sup> Article 445-1, Criminal Code, [https://www.legifrance.gouv.fr/codes/article\\_lc/LEGIARTI000028311918](https://www.legifrance.gouv.fr/codes/article_lc/LEGIARTI000028311918)

<sup>6</sup> Article 445-2-1, Criminal Code, [https://www.legifrance.gouv.fr/codes/article\\_lc/LEGIARTI000039183228/](https://www.legifrance.gouv.fr/codes/article_lc/LEGIARTI000039183228/)



## 5. FRENCH INTEGRITY MANAGEMENT FRAMEWORK

In France, fight for integrity in sport is carried by several protagonists. This section aims to mention the main actors, while explaining the collaborative links between each of them.

### 5.1. Global national stakeholders involved in fight against sport manipulations

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- Ministère chargé des Sports

The Ministry of Sport is involved in the field of integrity in several ways. Indeed,

- It develops and makes available to all sports stakeholders a range of prevention tools to raise awareness of each of the issues related to integrity and to avoid behaviour that has no place in their field of sport;
- It contributes to the existing conventional, legislative and regulatory framework on these issues;
- It ensures that these different frameworks are respected and implemented;
- It supports associative partners involved in these issues in order to strengthen awareness-raising actions aimed at sport players.

- Comité national olympique et sportif français (CNOSF)

The French National Olympic and Sports Committee is both the representative of the French sports movement to the public authorities, in particular the Ministry of Sport, and the representative in France of the International Olympic Committee.

Given the importance of integrity issues within the IOC, the CNOSF is particularly active on the subject. In particular, it has published a practical "Guide Intégrité<sup>7</sup>" code book to help everyone involved in sport find answers to the situations in which they may find themselves.

<sup>7</sup> « Guide d'intégrité », CNOSF, <http://cnosf.franceolympique.com/cnosf/fichiers/File/Juridique/Integrite/08-cnosf-guideintegritesportive-120x180.pdf>

- Autorité nationale des Jeux

The ANJ regulates authorised online, point-of-sale and racetrack gambling and monitors the responsible gaming policy of casinos. It ensures that operators authorised to operate on the French market comply with their obligations. It also protects players from the risks of excessive gambling and guarantees a recreational gambling offer. It fights against illegal gambling and fraudulent practices.

The ANJ's missions are based on four objectives:

- Preventing excessive gambling and ensuring the protection of minors;
- Ensuring the integrity of gambling operations;
- Ensure the balance between the different gambling channels;
- Preventing fraudulent activities;

- La Française des jeux (FDJ)

FDJ is France's leading gambling operator, the second largest lottery in Europe and the fourth largest in the world. FDJ is a monopoly operator of lottery and sports betting games in retail outlets and also manages activities open to competition - mainly online sports betting.

La Française des Jeux is also a key stakeholder in terms of awareness raising and prevention regarding match-fixing.

- Fédération nationale des Associations et des Syndicats de Sportifs (FNASS)

FNASS is a representative trade union organisation bringing together five disciplines (football, basketball, rugby, cycling, handball). It monitors regulatory and legislative developments, both at French and European level, and ensures that the legal environment of professional sport evolves favourably by protecting the interests of athletes.

The FNASS works with public authorities and administrative authorities, like the Ministry of Sports as well as the French Anti-Doping Agency (AFLD) and ANJ.

- Service central des Courses et Jeux (SCCJ)

Service central des Courses et Jeux is one of the four central units of the Direction centrale de la Police judiciaire, a directorate of the French National Police with national and territorial competence for investigating and fighting serious crime.

It supervises gaming establishments, racecourses, horse and sports betting and games related to new technologies. It has both administrative and judicial police functions.

The main mission of this service is to ensure the regularity and sincerity of the games, whatever they may be, as well as the protection of players and the defence of the State's interests, and to carry out administrative investigations in the regulatory field of gaming.

- Parquet national financier (PNF)

Parquet national financier is a French judicial institution created in December 2013 which is responsible for tracking down serious economic and financial crime. Since its installation on 1 March 2014, the financial public prosecutor deals with highly complex cases for which he has authority throughout France.

## 5.2. Key stakeholders involved in fight against sport manipulations in tennis

- Fédération française de tennis (FFT)<sup>8</sup>

The French tennis federation is the governing body for tennis in France. It is in charge of the organisation of tennis competitions, supporting and coordinating tennis clubs, managing the French national teams and promoting the sport.

For several years now, the FFT has set up a dedicated integrity unit with several people in charge of awareness-raising, training and interventions in clubs, CREPS (vocational sports training centers) and youth athletics training schools.

In 2018, the FFT also launched LIFT, a tennis training platform, accessible to all players and referees, which includes elements on sport integrity.

It should also be noted that the FFT works in close collaboration with the ITIA (International Tennis Integrity Agency)

In line with the legal provisions set out in the sports code, the federation has established a charter of ethics and deontology.<sup>9</sup>

- International tennis Integrity Agency<sup>10</sup>

The International Tennis Integrity Agency (ITIA), is an independent body established by the international governing bodies of tennis to promote, encourage and safeguard the integrity of professional tennis worldwide.

Funded by the sport's seven major stakeholders - the International Tennis Federation, ATP, WTA, Australian Open, French Open, Wimbledon and the US Open, ITIA has a direct relationship with French tennis authorities.

<sup>8</sup> Official website, <https://www.fft.fr/>

<sup>9</sup> Charte d'éthique, de déontologie, de prévention et de traitement des conflits d'intérêts, [https://comite.fft.fr/vienne/vienne\\_d/data\\_1/pdf/ch/chartethique2020.pdf](https://comite.fft.fr/vienne/vienne_d/data_1/pdf/ch/chartethique2020.pdf)

<sup>10</sup> Official website, <https://www.itia.tennis/>

### 5.3. Key stakeholders involved in fight against sport manipulations in handball

Considering the “Karabatic case”, as mentioned above, the handball stakeholders are particularly mobilised on the issue of match-fixing. Integrity officers are nominated in each club evolving in the first and second divisions of the men's championships and first division for women's championship.

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- Fédération française de handball<sup>11</sup>

The Fédération française de handball is the governing body for handball in France. It is in charge of the French men's and women's teams, the French men's and women's cups as well as all amateur competitions.

The French handball federation has set up a “ethics and citizenship” commission with an independent power of appreciation and responsible for ensuring compliance with the French handball federation's ethics and deontology charter<sup>12</sup>.

- Ligue nationale de handball<sup>13</sup>

It is the association that organises and promotes the professional competitions of men's handball clubs, i.e. clubs playing in the French First and Second Division Championships, i.e. 32 professional clubs. It also organises the League Cup and the Champions Trophy.

In its statute and regulation document, in the chapter devoted to the integrity of NHL competitions, Article 1.1.1 explains the role and mission of the LNH integrity officer :

- Is the referent within the LNH for all matters relating to the integrity of professional handball competitions.
- Ensures close collaboration with the competent public authorities and, where applicable, his counterpart within the Federation;

<sup>11</sup> Official website, <https://www.ffhandball.fr/>

<sup>12</sup> Charte d'éthique et de déontologie, [https://res.cloudinary.com/ffhb-production/image/upload/v1629706214/ffhb-prod/assets/13\\_ethique\\_2021-22\\_v23-08-2021.pdf](https://res.cloudinary.com/ffhb-production/image/upload/v1629706214/ffhb-prod/assets/13_ethique_2021-22_v23-08-2021.pdf)

<sup>13</sup> Official website, <https://www.lnh.fr/>

- Coordinates the awareness-raising action carried out by the LNH on the subject of the integrity of competitions with the players concerned;
- Coordinates the LNH's operational action to preserve the integrity of competitions and Coordinate the LNH's operational action to preserve the integrity of competitions and to ensure compliance with the rules set out in the field of integrity.

The Integrity Officer is responsible for awareness-raising activities. By decision of the LNH Board of Directors, the organisation may be delegated to any competent person, in particular a union representative (clubs, players or coaches).

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Article 2.2.4 clearly states that *"any involvement in an act of fraud, swindling or corruption, consisting of the use of fraudulent manoeuvres with a view to artificially influencing the normal and fair course of a competition or meeting organised or authorised by the LNH in connection with sports betting, is liable to result in the imposition of one or more of the sanctions provided for in these regulations."*<sup>14</sup>

- Ligue féminine de handball<sup>15</sup>

Created in 2008, the LFH via a delegation of the French Handball Federation, has for 3 missions:

- To organise and ensure the smooth running of its championship and events (regular season, playoffs and playdowns, conference);
  - To develop and promote this championship and all its activities, notably through its economic and media development;
  - To ensure the promotion, development and preservation of the integrity of professional women's handball and the women's championship.
- Association des joueurs de handball professionnels (AJPH)<sup>16</sup>

The Association of Professional Handball Players is an union created in 2004. Its mission is to defend the rights and interests of professional handball players in France.

<sup>14</sup> LNH charter, <https://docs.lnh.fr/textes/258/>

<sup>15</sup> Official website, <http://www.handlfh.org/>

<sup>16</sup> Official website, <https://www.ajph.fr/>

Before the start of each season, the AJPH teams organise a meeting with each professional squad, i.e. the first and second men's divisions and the first women's division. They start working with some of the clubs in the women's second division.

They also have an information mission with the training centres since the Federation delegates by agreement the possibility of intervening with the training centres, as well as the "talented young athletes centres".



#### 5.4. Key stakeholders involved in fight against sport manipulations in football

- Fédération française de football<sup>17</sup>

The French Football Federation (FFF) is the governing body of football in France. It organises, supervises and regulates the practice of amateur and high-level football, their financing and the training of players and coaches throughout the country. It organises, supervises and directs all national teams.

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- Ligue de football professionnel (LFP)<sup>18</sup>

The LFP is a French governing body that runs the two professional football leagues in France (Ligue 1 and Ligue 2).

This organisation is in charge of overseeing, organizing, and managing these two top leagues in France, and is responsible for forty-four professional French clubs.

The LFP is particularly involved in the fight against match-fixing, notably through the organization of awareness seminars, the appointment of integrity delegates and the publication of an educational manual specifically dedicated to sports betting.

- Union nationale des footballeurs professionnels (UNFP)<sup>19</sup>

The UNFP is the major trade union for French professional football players (men and women).

They raise awareness among the players through training sessions, within the clubs, with experts in order to explain to the players the consequences of such behaviours but also what are the stakes.

UNFP also works on the development of new tools (like "Passeport Pro").

<sup>17</sup> Official website, <https://www.fff.fr/>

<sup>18</sup> Official website, <https://www.lfp.fr/>

<sup>19</sup> Official website, <https://www.unfp.org/>

A close-up photograph of a fencer in a white uniform, holding a black fencing mask. The fencer's face is partially visible at the top, showing a beard and mustache. The background is dark and out of focus.

## **6. GENERAL RECOMMENDATIONS TO STRENGTHEN THE FRENCH INTEGRITY MANAGEMENT FRAMEWORK.**

According to the experts, France appears to be theoretically well protected against the threat of match-fixing. However, the regular occurrence of alerts, the increasing complexity of corruption techniques and the diversification of attempted approaches should not lead to believe that French sport is immune to all risks.

In order to strengthen the integrity of the existing French management framework, several general recommendations for French sport as well as recommendations more specific to the sports studied can be made.

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### 6.1. Keep developing the sharing of good practices and exchanges between sports

On a subject as sensitive as this one, the exchange of information is key to success of an effective coordinated fight against the manipulation of sport. Although Covid-19 has obviously consequences on sport, people interviewed thought that this did not hinder communication. However, **several mentioned the need to meet on a more regular basis.**

Moreover, all respondents emphasised the importance of contact with the players in the context of awareness-raising and why they need to adopt a very practical approach. It has become unnecessary or even counterproductive to have a manichean approach, just saying that fixing is bad for sport. There is now a real change in the approaches adopted by sports: player testimonies, role play, development of serious games. **So there is a real interest in sports continuing to exchange best practices.**

### 6.2. Stimulating moral judgment in order to make sporting-related match-fixing no longer a "blind spot"

While the fight against match-fixing now appears to be a priority in sport in the same way as corruption or doping, match fixing is often approached only through the prism of betting.

On this specific issue, awareness-raising sessions are organised within clubs by leagues, federations or even unions. These exchanges, organised in an

increasingly practical manner, systematically seek to take prevention further by confronting sports players (players, trainers, managers) with practical cases, thus giving them the keys to know how to react to situations.

However, this work is too light on the subject of sporting-related match-fixing. It now seems **essential that the issue of the fight against match-fixing linked to sporting issues should also be considered** by those involved in sport in order to be able to combat this phenomenon effectively. Addressing this type of manipulation also **helps to stimulate moral judgment** regarding the fact that sporting-related match-fixing is wrong, as **it threatens the credibility and attractiveness of sport**. In the same way as for the reflections on the sports betting issue, it is essential that stakeholders become aware of all the ethical questions underlying this type of manipulation.

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### 6.3. Improving monitoring and risk management in lower levels of sport

In various interviews conducted, several experts pointed out that the professional leagues are well prepared and train to deal with the threat of match-fixing.

However, **they draw attention to the significant risk that may be present in the lower divisions which do not seem to be sufficiently prepared** to deal with approaches and risk management linked to match-fixing. The results of EPOS in France, as in other partner countries, highlight the fragility of this sector and the recurrence of this phenomenon within these clubs.

Regarding the situation, the lack of risk management in the lower divisions can lead to a long-term threat to the top divisions. **There is therefore two important needs: the consolidation of the ethical culture within amateur clubs and more monitoring.**

### 6.4. Focusing prevention on young athletes

In the course of the study, as in the interviews conducted, **young sportsmen and women appeared to be a particularly vulnerable group** that should be protected as a priority.

Their active presence on social networks, their possible lack of supervision and the precariousness in which they may evolve lead to believe that they are privileged targets of attempts at approach.

Moreover, **stimulating moral judgement from a very young age** also appears to **be a priority issue**, thus making **it possible to develop a culture of ethics** throughout their career.

## 6.5. Prevention about contact through social networks

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**With the proliferation of social networks** (Facebook, Twitter, Instagram, Snapchat, TikTok), and the immense ease with which players can be contacted directly, **the risk of match-fixing has increased**. Indeed, many players reveal that they have been contacted in order to obtain information, offer to fix a match or receive threats and insults because of their performance.

**Leagues, clubs, federations and unions need to be more aware on the issue** and **give sports players all the tools they need to fight against these new types of approaches** and know how to react. Considering the dynamism of this trend, these preventions will have to be considerably reinforced.

## 6.6. Enhancing and disseminating « Signale » platform

In order to respond to the phenomenon of manipulation of sporting events and aware that whistleblowing is a key element to be taken into account in the fight against this threat, the world of sport has developed various platforms (Red Button, Hand Clean for example) which allow testimonies or elements to be reported to indicate approaches or suspicions.

Determined to act collectively against this scourge, in April 2021 France set up a dedicated platform called "Signale"<sup>20</sup>, financed by the French Sports Foundation, which is funded by the Ministry of Sports, the FFF, the ANLSP, the FNASS and the Française des Jeux. A multi-sport platform,

**SIGNALE!**



<sup>20</sup> Website for the platform : [www.signalesport.fr/](http://www.signalesport.fr/)

perfectly anonymous, it allows information and reports to be sent in on any facts related to the manipulation of sports matches or attacks on the integrity of sport.

**The main challenge now is to disseminate this platform to all those involved in sport** (players, trainers, managers, executives). After several months of launch, it is **now essential to communicate about its existence, in order to make it known and accepted by the sports community.**

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## 6.7. Ratifying the Macolin Convention

The “Council of Europe Convention on the Manipulation of Sports Competitions<sup>21</sup>” (hereafter referred to as Macolin Convention) is often mentioned as a key document regarding the issue of match-fixing related to betting. Regarding the definition and the scope of the convention, it is also particularly relevant to the issue of sporting-related match-fixing and therefore to the EPOSM project.

Indeed, this Convention defines “manipulation of sports competitions” as “an intentional arrangement, act or omission aimed at an improper alteration of the result or the course of a sports competition in order to remove all or part of the unpredictable nature of the aforementioned sports competition with a view to obtaining an undue advantage for oneself or for others.”

As mentioned before, although the Convention was officially signed by France on 02 October 2014, and France has been a driving force on this issue, it has still not been ratified. This ratification has been called for by many sports and political actors for several years now. Due to differences between EU Member States on definitions given by the Convention, ratification was compromised. However, the Court of Justice of the European Union gave an opinion<sup>22</sup> in October 2021 on the Istanbul Convention, paving the way for ratification in the near future.

Therefore, **France has a political, diplomatic and strategic interest in ratifying the Macolin Convention** as soon as possible. By doing so, France would join the 7 States that have already ratified, **and thus could participate**

<sup>21</sup> Council of Europe Convention on the Manipulation of Sports Competitions, Council of Europe, September 2014, <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016801cdd7e>

<sup>22</sup> Opinion 1/19 of the Court (Grand Chamber), 6 October 2021, Court of Justice of the European Union, <https://curia.europa.eu/juris/document/document.jsf?docid=247081&mode=req&pageIndex=1&dir=&occ=first&part=1&text=&doclang=EN&cid=1982807>

**in the monitoring group provided for by the Convention, which Paris cannot join for the moment.**

## 6.8. Strengthening cooperation with national and international federations and the Group of Copenhagen

As mentioned above, cooperation at national level between the various stakeholders on the issue of manipulation of sports events have been institutionalised for more than a decade. Among many initiatives, the appointment of **integrity officers** and **integrity referents** within 32 federations and 5 leagues<sup>23</sup>, and the launch of the National Platform against the Manipulation of Sports Competitions, as provided for in Article 13 of the Macolin Convention, are useful tools that allow for valuable exchanges of information between the various stakeholders. France's participation within the Copenhagen Group is also an essential element in the prevention of manipulation and the transmission of information.

Nevertheless, **further discussion and exchange of best practice between the different stakeholders appears essential in the coming months for several reasons.**

On the one hand, despite the various measures implemented to mitigate the effects of the crisis, Covid-19 will inevitably have had an impact on exchanges between the various stakeholders. As competitions resume in 2020 and 2021, it seems essential to continue and strengthen the discussions between the various stakeholders.

This issue is all the more important in view of the development of the ecosystem around sportsmen and women. For example, from now on, having direct access to sports players through social media (Twitter, Instagram, TikTok) is a piece of cake. Indeed, an increasing number of players report contacts via their messaging systems. Different actors in sport have already addressed these elements in their actions. **The sharing of good practices and exchanges on the subject appears to be strongly recommended** in order to deal with this fundamental phenomenon in a collegial manner and considered accordingly in the athletes' training so that they behave correctly in the event of such approaches (disclosure of inside information, obligation to report) to avoid damage to their careers.

<sup>23</sup> L'annuaire des délégués et référents intégrités est disponible ici : <https://cnosf.franceolympique.com/cnosf/actus/4893-lannuaire-des-dlgus-intgtrit.html>



Finally, considering the fact that **France is currently hosting major sporting events**, it seems essential that all those involved in the world of sport share essential information in an efficient way.

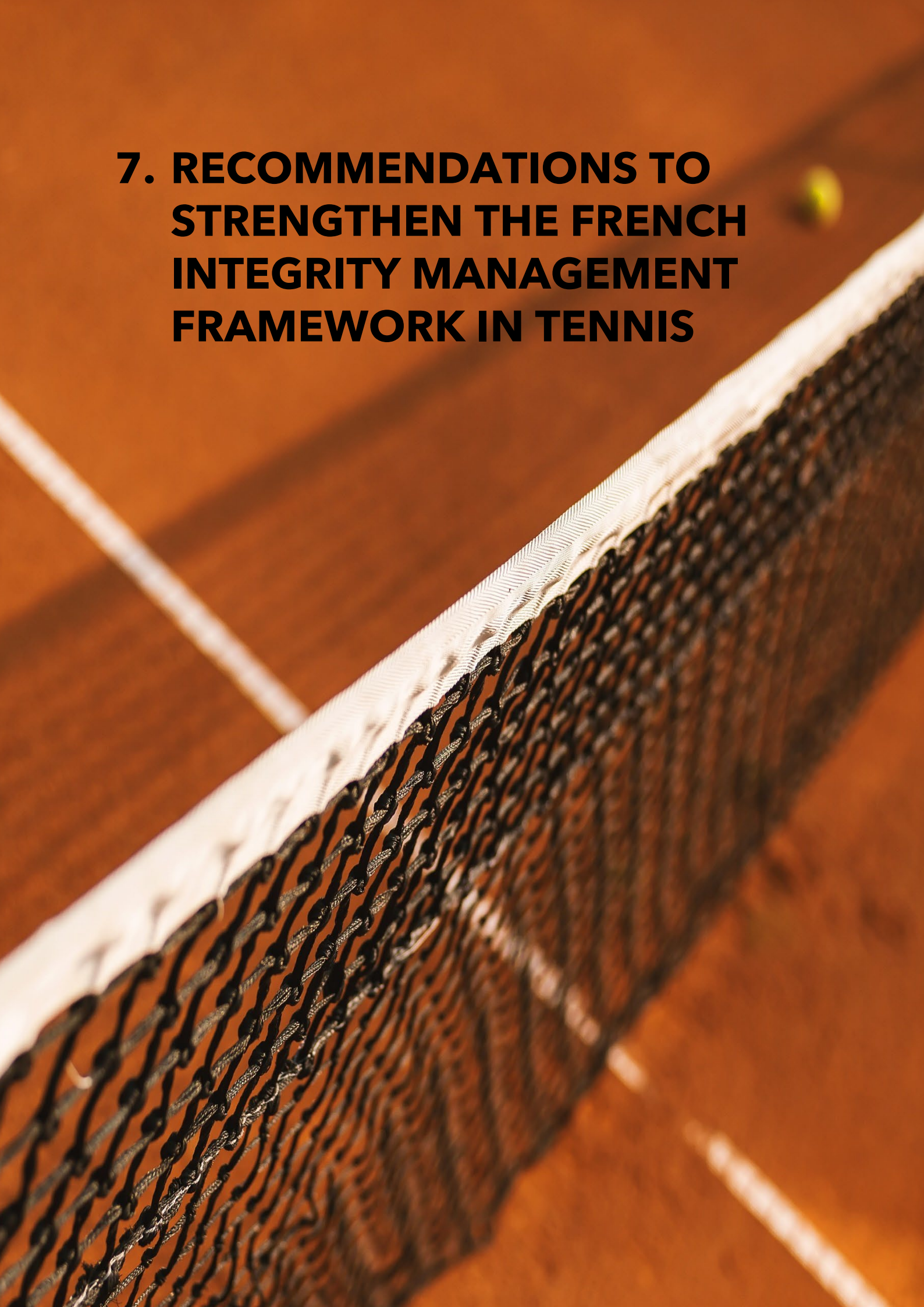
## 6.9. Researching on integrity issues and sporting-related match-fixing

This EPOSM study was a pioneer in research on sports-related match-fixing and succeed to answer to several questions.

Nevertheless, many questions remain unanswered and **new research and investigations should be conducted on regular basis** in order to confirm or refute the results presented here. Regarding our recommendations, a special attention could be focus on the lower divisions.

This **would allow public authority to also monitoring the impact of education and awareness campaign**. Issues like trust in reporting platform or ethical awareness could also be evaluated.

## **7. RECOMMENDATIONS TO STRENGTHEN THE FRENCH INTEGRITY MANAGEMENT FRAMEWORK IN TENNIS**



Tennis, being mainly an individual sport, is quite exposed to the risk of match-fixing. It is proved that it is easier to fix a match on individual sport than in a team sport discipline.

In order to reduce this risk, several recommendations can be made here, in addition to the general recommendations presented above.

### 7.1. Reforming the price-money

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**The issue of price-money has been identified by several interlocutors and reports as a potential source of vulnerability.** As mentioned in the report of the Independent review of Integrity in Tennis in 2018<sup>24</sup>: *"the player incentive structure creates a fertile breeding ground for breaches of integrity. Only the top 250 to 350 players earn enough money to break even. Yet there are nominally 15,000 or so 'professional' players. The imbalance between prize money and the cost of competing places players in an invidious position by tempting them to contrive matches for financial reward. Players may be particularly tempted in relation to matches that they intended to 'tank' for unrelated reasons – a factor that has been aptly described as the "seeds of corruption" – or in matches that they believe they can win even while contriving to lose games, sets, or points along the way"*.

The question of the precariousness of the players also arises since there may be a desire for some to participate in tournaments without having the desire to win certain matches.

At the professional level, this reflection was particularly highlighted in France by a French player, Benoit Paire, who pointed out that thanks to price-money, losing the first match of a tournament could, at the end of the season, bring him as much money as winning several tournaments.

**Therefore, a deeper reflection on the financing of tournaments and ultimately of the players is needed.**

### 7.2. Focusing on the follow-up of players at the end of their career

In addition to young people, who are considered potentially vulnerable, **it is also important to be vigilant with regard to players at the end of their**

<sup>24</sup> Independent Review of Integrity in Tennis, 2018, <https://www.atptour.com/-/media/files/independent-review-of-integrity-in-tennis-interim-report-2018.pdf>



**careers.** Several cases and testimonies testify that these players could be perpetrators or subjects of manipulation attempts.

Thus, given the precariousness of their situation and in the same way that a special attention is given to young players, it **is essential to support them in their professional transition, during their end of career.**

### 7.3. Being vigilant regarding the coaches

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While much attention is paid to the players, the **coaches may be off the radar.** However, they remain central actors (perpetrators or victims) in cases of manipulation of sports matches, given their position vis-à-vis the athlete.

In the risk mapping, **coaches appear as particularly key actors** since there is no **official list of coaches linked to players.**

Thus, during tournaments, there may be people who claim to be with the players who are not necessarily aware of or trained in integrity issues.

**Thus, the creation of an official list of coaches** (or at least their declaration) **before the tournaments is essential. This official list could be linked to a mandatory training as it is the case for the players.**

### 7.4. Strengthening collaboration with ITIA

Considered more powerful than the Tennis Integrity Unit before it, the ITIA is a young institution funded by the sport's seven major stakeholders - the International Tennis Federation, ATP, WTA, Australian Open, French Open, Wimbledon and the US Open.

It is **therefore essential to strengthen links and collaboration between ITIA and the national platforms but also ITIA and tournament organisers.** The occurrence of suspected fixing during the last French Open confirms this **urgent need** to be particularly reactive in case of an alert. This collaboration will result in a responsiveness that will be valuable in the resolution of cases.



## **8. RECOMMENDATIONS TO STRENGTHEN THE FRENCH INTEGRITY MANAGEMENT FRAMEWORK IN HANDBALL**



In view of the various cases that have marked the history of French handball, it seems essential to reinforce the prevention measures on the issue of manipulation of sports matches. Enormous efforts have been made over the past 10 years on this subject, but it remains essential to continue working on it.

In order to reduce this risk, several recommendations can be made here, in addition to the general recommendations presented above.

### 8.1. Taking into account the diversity of nationalities of the players

Regarding the “Karabatic case”, handball has, for the past twenty years, been particularly active and advanced in the fight against match fixing. The joint efforts of the federation, the leagues and AJPH have greatly reinforced vigilance. The **awareness-raising sessions organised by these actors about the issue of match fixing remain essential.**

However, as mentioned by several experts, the Karabatic scandal happened almost a decade ago, and many players, due to the fact that they are foreigners or too young, do not know about it. It is therefore essential not to consider this scandal as "protection".

Again, as mentioned by several experts, the French championships, both men's and women's, are really attractive and many new players decide to come to join French clubs. However, **some foreign players could have a different approach against match-fixing than in France. It is therefore necessary to ensure that these players are well aware of the French rules.**

### 8.2. Increasing the regularity of training sessions

Awareness-raising is an essential element in the authorities' efforts. In view of the importance of the subject and the risks it entails for sport, it would no doubt be appropriate to reinforce them. As mentioned above, the various awareness-raising activities are carried out just before the start of the season. **Due to a busy international calendar, awareness-raising is carried out in a very limited period.** However, **AJPH has launched various initiatives (educational videos, quizzes, WhatsApp groups) that can be excellent sources of inspiration for other sports.**

### 8.3. Being vigilant regarding all the actors of sport

While dedicated training sessions for coaches and players have become the norm, **it would be relevant to generalise these trainings it to all actors: staff, managers, governing bodies, referees.**

## **9. RECOMMENDATIONS TO STRENGTHEN THE FRENCH INTEGRITY MANAGEMENT FRAMEWORK IN FOOTBALL**





Because of its notoriety and the colossal financial stakes it carries, football could appear as a vulnerable sport. Beyond the measures implemented and the importance that sporting integrity has for the institutions that manage football in France, several additional recommendations can be made here.

### 9.1. Enhancing the initiatives already carried out

Football has, for the past twenty years, been particularly active and advanced in the fight against sports manipulation. Through the organisation of seminars, awareness-raising and training, football stakeholders have been particularly active and effective. **However, all the materials and supports produced are not sufficiently promoted.**

For example, the LFP has developed a very valuable handbook on sports betting for several years. However, it does not appear directly on the LFP website and does not seem to have been updated since the launch of the 2020/2021 season. It **therefore seems important to capitalise on all the steps already taken to anchor this culture of ethics** among the various actors.

### 9.2. Clarifying the position on the whistleblowing issue

In terms of raising alerts, **it seems difficult for football players to find their way around the various initiatives.**

For example, while FIFA has set up a hotline for players and referees, UEFA has also launched a hotline, as well as a secure website ([uefa.integrityline.org](https://uefa.integrityline.org)), open to all. FIFPro for its part has developed an alert system called "Red Button", which allows registered Pro players in a database to send, anonymously and confidentially, information that they consider suspicious.

To all of these devices is therefore added the French platform "Signale!".

While the question of trust is crucial in the whistleblower process, **the multiplication of information feedback channels can, on the contrary, discourage people wishing to testify or report a suspicion.** Also, a clarification on the tools to be used now appears essential.

### 9.3. Increasing vigilance on women's soccer

**Regarding the increasing development women's football in recent years, a particular attention should be paid to these female player and championships.**

As pointed out by several FIFPro reports, **the status of women footballers is still precarious. That could make them particularly vulnerable to manipulation.** However, in recent years, the figures show that few cases have concerned women athletes.

This should remain an area of vigilance, particularly in the light of what happened in September 2021. Several female players evolving in Division 1 (1<sup>st</sup> top division) clubs have been approached to fix a match. Fortunately, they immediately notified their management and the relevant authorities. The investigation is still ongoing but suggests that this case was more of a fraud than a genuine attempt of sport manipulation.

## 10. REFERENCES

### BOOKS

Boniface, P., Lacarrière, S. & Verschuuren, P. (2012). *Paris sportifs et corruption - comment préserver l'intégrité du sport*, Paris, Armand Colin.

Kalb, C. & Verschuuren, P. (2013). *Blanchiment d'argent : un nouveau fléau pour les paris sportifs ?*, Paris, Armand Colin.

47

### ARTICLES

Robertson, J. & Constandt, B. (2021). Moral disengagement and sport integrity: identifying and mitigating integrity breaches in sport management, *European Sport Management Quarterly*, Volume 21 - Issue 5 : Societal impact of Elite Sport.

Van Der Hoeven, S., De Waegeneer, E., Constandt, B., & Willem, A. (2020). Match-fixing: Moral challenges for those involved. *Ethics & Behavior*, 30(6), 425-443.

Van Der Hoeven S, Constandt B, Schyvinck C, Lagae W & Willem A (2021). The grey zone between tactics and manipulation: The normalization of match-fixing in road cycling. *International Review for the Sociology of Sport*.

### REPORT / HANDBOOK

Agreement creating the national platform to fight against the manipulation of sports competitions, 28<sup>th</sup> January 2016, [https://sports.gouv.fr/IMG/pdf/signature\\_plateforme\\_nationale\\_lutte\\_manipulation\\_compets\\_sportivesvdef.pdf](https://sports.gouv.fr/IMG/pdf/signature_plateforme_nationale_lutte_manipulation_compets_sportivesvdef.pdf)

Annual report from the French platform to fight against the manipulation of sports competitions, 2019-2020,

[https://sports.gouv.fr/IMG/pdf/rapport\\_plateforme\\_nationale\\_2019-20.pdf](https://sports.gouv.fr/IMG/pdf/rapport_plateforme_nationale_2019-20.pdf)

Charter of ethics, prevention and treatment of conflict of interest, French Tennis Federation,

[https://comite.fft.fr/vienne/vienne\\_d/data\\_1/pdf/ch/chartethique2020.pdf](https://comite.fft.fr/vienne/vienne_d/data_1/pdf/ch/chartethique2020.pdf)

Charter of ethics and deontology, French Handball Federation,

[https://res.cloudinary.com/ffhb-production/image/upload/v1629706214/ffhb-prod/assets/13\\_ethique\\_2021-22\\_v23-08-2021.pdf](https://res.cloudinary.com/ffhb-production/image/upload/v1629706214/ffhb-prod/assets/13_ethique_2021-22_v23-08-2021.pdf)

Code of Ethics of the IOC, 2016,

<https://stillmed.olympic.org/media/Document%20Library/OlympicOrg/IOC/What-We-Do/Leading-the-Olympic-Movement/Code-of-Ethics/EN-IOC-Code-of-Ethics-2016.pdf>

Legal approaches to tackling the manipulation of sports competitions, UNODC,

[https://www.unodc.org/documents/corruption/Publications/2021/Legal\\_Approaches\\_to\\_Tackling\\_the\\_Manipulation\\_of\\_Sports\\_Competitions\\_EN.pdf](https://www.unodc.org/documents/corruption/Publications/2021/Legal_Approaches_to_Tackling_the_Manipulation_of_Sports_Competitions_EN.pdf)

Olympic Movement Code on the prevention of the manipulation of competitions,

2018, <https://stillmed.olympics.com/media/Document%20Library/OlympicOrg/IOC/What-We-Do/Protecting-Clean-Athletes/Competition-manipulation/Code-Prevention-Manipulation-Competitions.pdf>

Sport integrity handbook, French Olympic Committee,

<https://cnosf.franceolympique.com/cnosf/fichiers/File/Juridique/Integrite/08-cnosf-guideintegritesportive-120x180.pdf>

Sports betting handbook, Professional Football league,  
<https://www.lfp.fr/manuel-paris-sportifs>

## CONVENTION

COE (Council of Europe), n.d., The Convention on the Manipulation of Sports Competitions (the Macolin Convention), Retrieved August 26th, 2020, from <https://www.coe.int/en/web/sport/t-mc>

## WEBSITES

HandClean, <https://www.hand-clean.com/>

Signale! , <http://www.signalesport.fr/>

EPOSM International Symposium programme, [https://580c85e0-750c-4393-90cf-323d9a94f8b0.filesusr.com/ugd/ed0a75\\_ac1e5eb5bdab4d1996799ba8757b847d.pdf](https://580c85e0-750c-4393-90cf-323d9a94f8b0.filesusr.com/ugd/ed0a75_ac1e5eb5bdab4d1996799ba8757b847d.pdf)