



Interkantonale Geldspielaufsicht
Autorité intercantonale de surveillance des jeux d'argent
Autorità intercantonale di vigilanza sui giochi in denaro
Swiss Gambling Supervisory Authority

Manipulation of sports competitions – national platform annual review 2020

Suspicious reported in year two after entry into force of the Federal Act on Gambling's provisions on competition manipulation

Bern, 6 May 2021

1. Introduction

By signing the European Council's Convention on the Manipulation of Sports Competitions¹ (Macolin Convention) in 2014, Switzerland has committed itself to cooperation with international partners in implementing hands-on measures. While coordinating the fight against competition manipulation and other political aspects are the responsibility of the Federal Office of Sport, the Federal Act on Gambling² assigns to the intercantonal authority (previously Comlot, from 1 January 2021 Gespa) the task of a "national platform" acting as reporting office. Gespa as reporting office ensures the flow of information between all parties involved (sports associations, law enforcement authorities, foreign reporting offices, betting operators, etc.) – thus playing a central role when it comes to investigating suspected cases.

Sports associations and organisations based in Switzerland that organise, conduct or supervise a sports event or participate in it are obliged by law to report any suspicion of manipulation to Gespa, provided the event takes place in Switzerland or bets are offered on it in Switzerland (Art. 64(2) Gambling Act). Also the two lottery companies (Swisslos & Loterie Romande) are legally obliged to inform Gespa about suspected manipulation in connection with sports competitions on which they offer betting (Art. 64(1) Gambling Act). Depending on the case at hand, Gespa will forward reports to law enforcement or other authorities, lottery companies, sports organisations and reporting offices abroad in accordance with legal requirements.

In its role as "Swiss national platform", Gespa is also a member of the Group of Copenhagen (GoC). The GoC is a network of national platforms and promotes the exchange of information between countries. Various working groups develop tools and processes to continuously improve this information flow. Via the online platform of the Danish anti-doping authority (ADD), reports on suspicious activities can be shared easily and safely with the GoC partners.

After the Macolin Convention's taking effect in 2019, a Follow-up Committee consisting of representatives from Italy, Greece, Norway, Portugal, Moldova, Ukraine and Switzerland began its work in 2020. As representative of the Swiss national platform, Gespa's Deputy Director formed part of the Swiss delegation at the inaugural meeting of the Committee.

In Switzerland, Gespa as reporting office also in 2020 formed the hub for the exchange of information between sports organisations, lottery companies as betting operators, the institutions of the Macolin Convention and other international partners, the GoC and law enforcement authorities. Official data on match-fixing is now available in Switzerland for the second time. This report provides a presentation and analysis of the information collected, in particular the suspicion reports received. Gespa makes no claims as to the completeness or methodological sophistication of its analyses. Rather, the aim is to set an example in an area where transparency is an important means of combatting wrongdoing – and to promote a culture where forthright communication of cases is not taken to indicate widespread delinquency, but is seen as a mark of integrity. No sport is immune from manipulation. By heeding legal reporting obligations, organisations show that they are serious about combatting sports competition manipulation.

It should be emphasised that reported suspicions do not mean that manipulation has actually taken place. Reports rest on anomalies and irregularities that may be due to manipulation. However, cases of manipulation are usually identified only by combining data and observations from agencies in several countries. Already during Gespa's initial assessment and triage, many cases (such as sudden significant changes in odds on the betting market) turn out to be

¹ SR 0.415.4.

² BGS, SR 935.51.

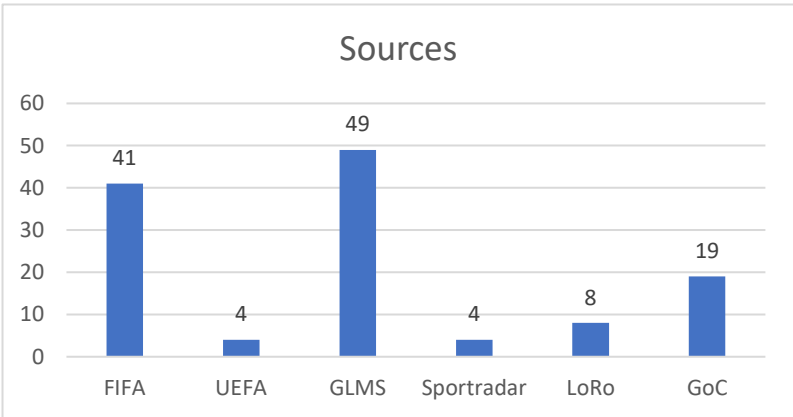
explicable without the assumption of manipulation (in the case of change in odds, for example by the fact that an important player is out due to injury).

2. Sources of reports

In total, Gespa received **125 suspicion reports concerning 97 sports events**. This is a significant decrease compared to the previous year (2019: 263 reports concerning 192 events). The likely reason is the Corona pandemic and the associated cancellations of sports events.

The majority of the reports were shared with Gespa by **GLMS³** (Global Lottery Monitoring System) and the international football governing body **FIFA**. GLMS filed **49**, FIFA **41** reports.

Loterie Romande (LoRo) forwarded **8** reports to Gespa in the year under review. Note that the lottery companies fulfil their reporting obligations largely via GLMS and partly via Sportradar (see below).



GoC partners shared a total of **19** alerts in 2020 via ADD's online platform mentioned above. These included a number of reports that were clearly unrelated to Switzerland and therefore did not require any action on Gespa's part.

Fig. 1: Number of reports by source

An important player when it comes to sports statistics and analyses, and thus also to detection of irregularities and suspicious cases in the field of sports betting, is **Sportradar**, a company also based in Switzerland (St. Gallen). Sportradar has informed Gespa repeatedly about suspicions in the past. In 2020, there were **4** reports.

Another **4** notifications reached Gespa from **UEFA**. In the year under review, talks were held with UEFA to clear up misunderstandings, and UEFA has declared its unconditional commitment to compliance with all federal regulations and the architecture of the Macolin Convention. Against this background, Gespa expects a significantly greater number of reports from UEFA in 2021.

The **International Olympic Committee (IOC)**, despite being based in Switzerland and thus subject to the reporting obligation, handed in no reports in 2020. The IOC points out that it invests considerable resources in the fight against competition manipulation. It also operates its own system, the Integrity Betting Intelligence System (IBIS), which is expressly designed to provide information to regulatory authorities and national platforms. In view of the fact that the Olympic Games could not take place in the year under review due to the Corona pandemic,

³ GLMS was founded by European Lotteries (EL) and the World Lottery Association (WLA). It operates a monitoring system with the same name, which has the purpose of detecting and analysing suspicious betting activities.

and that just one report was received in the previous year, one may assume that the responsible organisational unit of the IOC monitors only its own, i. e. Olympic competitions.

It must be emphasised that the legislator allows the reporting of cases for which there is no legal reporting obligation (for example, because no bets can be placed on the relevant event in Switzerland). Especially for Swiss-based international associations who wish to combat manipulation efficiently, Gespa, an institution under public law with an international network, is the point of contact of choice, being able to exchange suspicion reports with competent domestic and foreign authorities, in strict compliance with relevant data protection principles.

3. Overview of reports received

See also the tables in the appendix.

3.1 Sport

Gespa received suspicion reports in connection with 97 sports events in 2020. Nearly 88% of the reports concerned **football (85)**. Football accounts for by far the largest betting stakes around the globe. The huge number of games on the betting market and the high turnover volume are in themselves important and plausible reasons for the great number of reports. It is an open secret that football is strongly affected by manipulation, but the problem is also being actively combatted. Gespa expressly welcomes FIFA's role in this context.

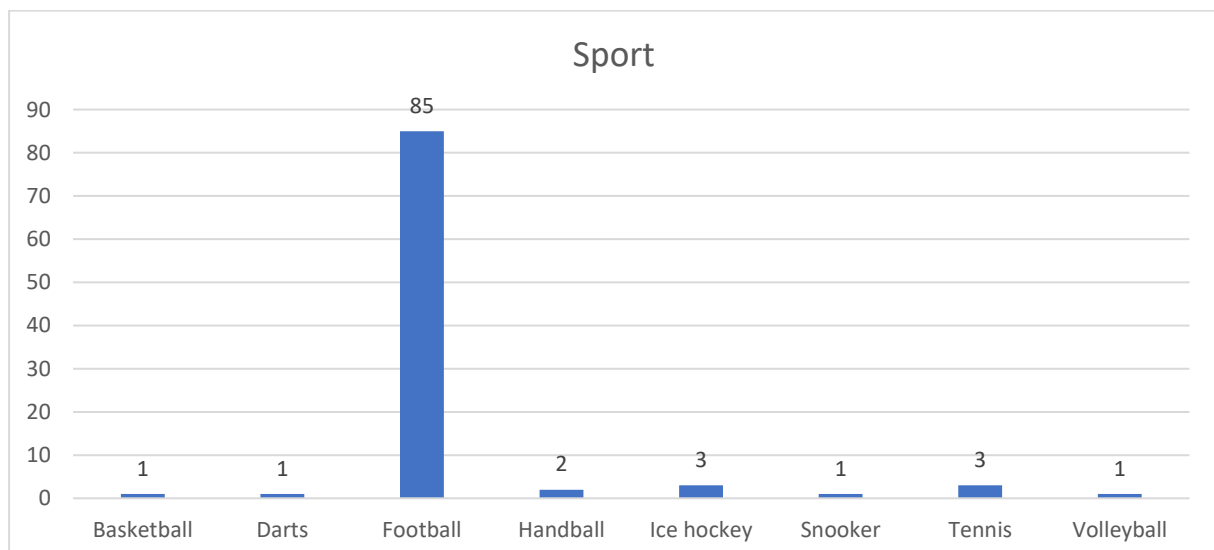


Fig. 2: Number of reports by sport

Three alerts each were related to **ice hockey** and **tennis**.

The ice hockey betting market is significantly smaller than that for football. While the sport enjoys little popularity in many countries, the NHL in particular has a certain international appeal and is accordingly attractive for betting.

As in the previous year, there were relatively few reports pertaining to tennis. Tennis has been struggling with the problem of fixing for a long time for various reasons. For one thing, prize moneys do not cover the costs for the majority of professional athletes. In addition,

manipulation in the context of prob betting (e. g. a deliberate double fault or break at a certain score) can be hard to detect and prove. Thus the incentives for and the risk of manipulation are increased. That Gespa nevertheless received only few reports may be due to the following reasons: manipulations are primarily observed at tournaments in the lower ITF categories, on which the Swiss lottery companies – for just this reason – are not allowed to offer bets. Also, the ITF (like the ATP and the WTA) is not based in Switzerland; accordingly, there is no reporting obligation in this regard. Finally, many smaller ITF tournaments usually held in Switzerland could not take place due to the Corona pandemic; in principle, the organisers of such tournaments also have a legal reporting obligation.

Basketball (1), handball (2) and volleyball (1) are not as important in Switzerland as are football, ice hockey and tennis, though basketball is fairly popular particularly in the French-speaking part of the country. In regard of the fact that the lottery companies offer a relatively wide range of bets in these sports and that the respective international governing bodies have their headquarters in Switzerland, the number of reports appears to be rather low. Also here, however, the consequences of the Corona pandemic, including some cancelled seasons, must be kept in view.

Further reports received by Gespa in 2020 were related to **darts (1)** and **snooker (1)**. The Swiss lottery companies are not permitted to offer bets on darts or snooker tournaments; these reports were therefore not directly linked to Switzerland. Nevertheless, it should be emphasised that such reports may be of interest to foreign authorities and are thus welcome by all means.

3.2 League/ranking

For various reasons (one important factor being the economic situation of the clubs and athletes), competitions in lower leagues and rankings are more frequently manipulated than matches in the popular top divisions and at major tournaments. This is one of the reasons why the two Swiss lottery companies are allowed to offer betting only to a very limited extent on events of the former type.

Despite this restriction of betting to higher leagues and large tournaments, it is remarkable that roughly half of the reports (**49**) concerned events in the top divisions. Here too, however, the pandemic was probably a contributing factor; at times, only the top leagues were played at all, while other leagues were interrupted or cancelled.

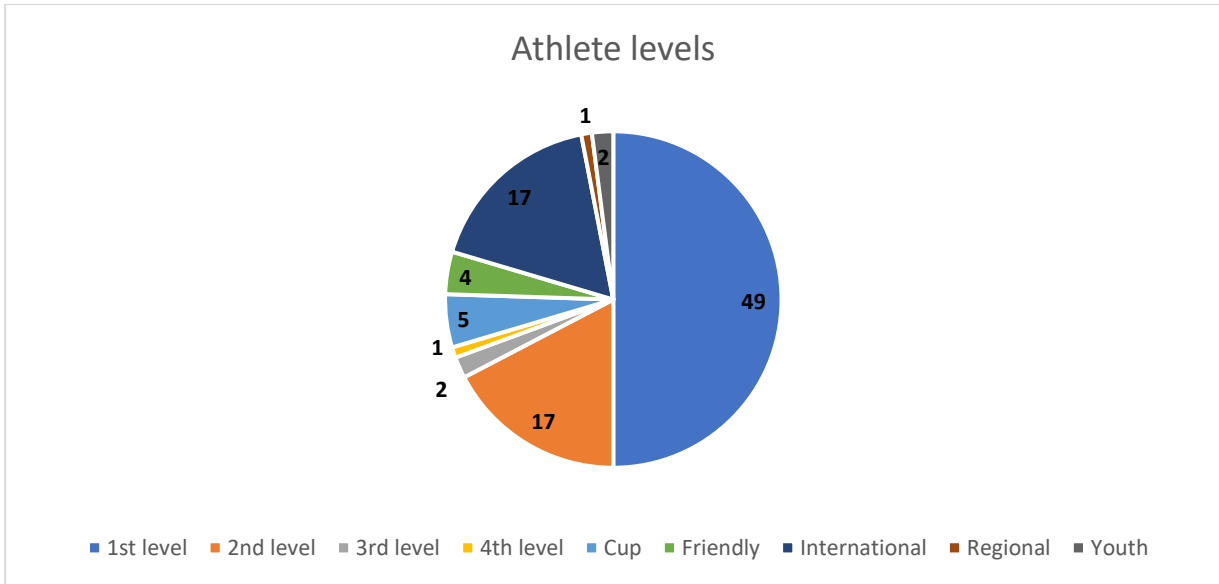


Fig. 2: Reports by athlete level

3.3 Gender

The alerts received by Gespa in 2020 concerned almost exclusively competitions with male athletes. Of the 97 alerts, just three involved competitions with female athletes only. In the year under review, Gespa did not receive any reports related to competitions with both male and female athletes. It should be noted that in football in particular, where the highest betting turnover is generated, much more betting is offered on men's than on women's games.

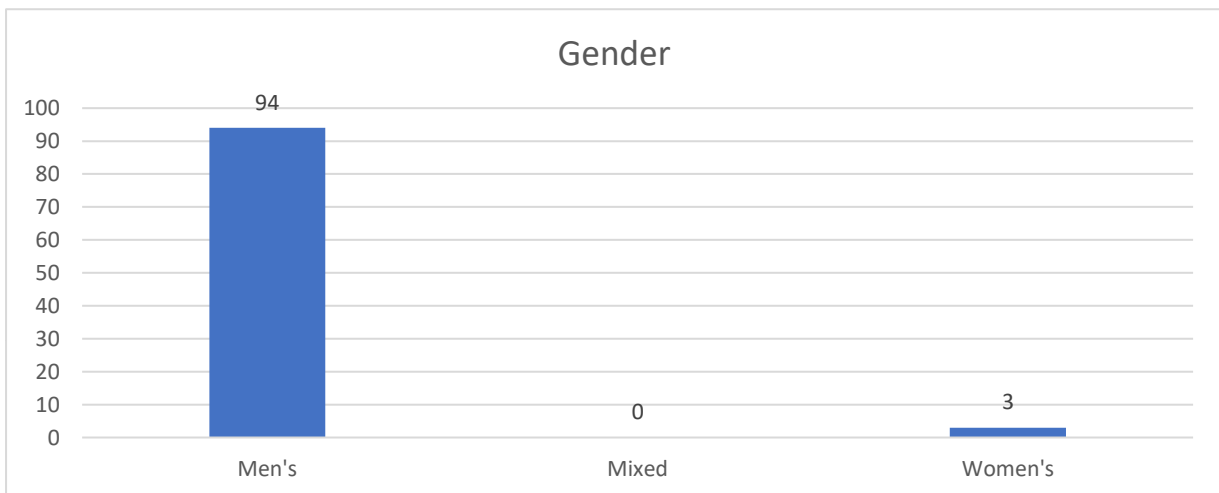


Fig. 3: Reports by athlete gender

4. Processing by Gespa

4.1 Law enforcement authorities

Law enforcement is basically the responsibility of the cantons. In order to ensure efficient information flow, Gespa collaborates with fedpol, which acts as an interface to the prosecution

authorities and, where indicated, forwards cases to the cantons. As a rule, Gespa informs fedpol in summarised form of all received reports after an initial triage has been completed. If a relation to Switzerland appears possible on the basis of the triage process, Gespa provides fedpol with full documentation for the attention of the responsible cantonal authority, and thus fulfils a central aspect of its legal mandate.

4.2 Group of Copenhagen

If, in the course of the examination of a report by Gespa, suspicion of manipulation hardens, and if there are no special circumstances that speak against forwarding, the report will be shared with the members of the Group of Copenhagen via the Anti Doping Denmark platform. The ADD system makes it possible to gain an international overview and to put in a larger context observations of events that may appear only little suspicious when viewed in isolation. Often, concrete suspicions only arise from a combined view of different events in different countries.

In 2020, Gespa shared a total of 34 reports with its Group of Copenhagen partners, making it by far the most active member of the group.

5. Cases linked to Switzerland

As a rule, Gespa provides information on individual cases related to Switzerland only if suspicions are substantiated, and only after all investigations have been completed and criminal proceedings have been ensured.

In 2020, there were no convictions in Switzerland for active or passive competition manipulation. However, as shown above, Gespa contributed significantly to the international exchange of information. Just as important are Gespa's efforts, within the framework of its Risk Assessment, to recognise dubious developments at an early stage, so that further leagues and competitions may be excluded from betting if required. Also in this context, the reports filed with Gespa and their careful evaluation are of great importance.

6. Concluding remarks

The Corona pandemic affected also the world of sports betting in 2020. Events had to be cancelled, seasons were interrupted and some sports betting outlets were temporarily closed.

The unusual circumstances also had an impact on the procedures involved in combatting manipulation. The figures summarised in this report are representative only to a limited extent and are likely to turn out different in "normal" years to come.

Due to the various restrictions, the international market saw more bets offered on sports that usually are not in the focus of betting providers and bettors. At the same time, new phenomena such as so-called phantom games emerged: here, dubious providers offered bets on matches that never took place (e. g. friendly matches between lower league football teams), and the market was served with fictitious results.

It will be obvious against this background that sports betting is here to stay, and that manipulators will keep finding new ways to profit from dishonest behaviour. Accordingly, the efforts of

the Macolin Convention's various stakeholders remain essential to ensure safe sports betting and to protect the integrity of sport as much as possible.

Appendix

M/F = male / female athletes

1. Football

International games (national teams)

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Europe	UEFA Nations League	M	1	
1			1	

International friendly games

Country / Continent	League / Competition	M / F	Number of reports	Remarks
International	International Friendly (clubs)	M	1	
1			1	

Asian club tournaments

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Asia	AFC Cup	M	1	
1			1	

European club tournaments

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Europe	Champions League qualif.	M	4	
Europe	Europa League qualif.	M	10	
2			14	

South American club tournaments

Country / Continent	League / Competition	M / F	Number of reports	Remarks
South America	Copa Sudamericana	M	2	
South America	Copa Libertadores	M	2	
2			4	

Africa

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Egypt	Premier League	M	4	
Kenya	Premier League	M	1	
2			5	

Asia

Country / Continent	League / Competition	M / F	Number of reports	Remarks
China	Super League	M	1	
South Korea	K League 1	M	1	
Tajikistan	Friendly	M	1	
Thailand	FA Cup	M	1	
Thailand	Thai League 2	M	1	
Uzbekistan	Pro League	M	1	
Vietnam	Championship U21	M	1	
7			7	

Europe

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Albania	Kategoria Superiore	M	1	
Armenia	Bardsragujn chumb	M	4	
Armenia	Aradschin chumb	M	1	
Belarus	Vysheyshaya Liga	M	5	
Belgium	Jupiler Pro League	M	3	
Bulgaria	First League	M	5	
Czech Republic	Friendly	M	1	
Cyprus	First Division	M	2	
Denmark	1. Division	M	1	
England	EFL Cup	M	1	
France	Ligue 1	M	2	
Germany	3. Bundesliga	M	1	
Hungary	Nemzeti Bajnokság I	M	1	
Italy	Serie B	M	2	
Kazakhstan	Premier League	M	1	
Kosovo	Superliga	M	1	
Netherlands	Eredivisie	M	3	
Romania	Liga 1	M	2	
Russia	Premjer-Liga	M	1	
Slovakia	Fortuna Liga	M	1	
Slovakia	2. Liga	M	1	
Slovakia	Cup	M	3	
Slovenia	Cup	M	1	
Spain	La Liga 2	M	2	
Sweden	Allsvenskan	M	5	
Sweden	Superettan	M	9	
Sweden	Division 1 Södra	M	1	
Sweden	Division 2	M	1	
Sweden	Friendly	M	1	
Switzerland	Super League	M	1	
Switzerland	Challenge League	M	1	

Ukraine	Premier League	M	1	
32			66	

US & Central America

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Honduras	Liga Nacional	M	3	
1			3	

South America

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Bolivia	Primera Division	M	3	
Brazil	Brasileiro B	M	1	
Brazil	Serie B2 (Regional)	M	1	
Ecuador	Primera A	M	2	
Peru	Primera Division	M	2	
5			9	

2. Ice hockey

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Norway	1. divisjon	M	1	
Slovakia	Tipos Extraliga	M	2	
Switzerland	Swiss League	M	1	
3			4	

3. Handball

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Europe	EHF Cup	M	1	
Europe	EHF Cup	F	1	
2			2	

4. Basketball

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Russia	VTB Youth United League	M	1	
1			1	

5. Tennis

Country / Continent	League / Competition	M / F	Number of reports	Remarks
USA	WTA Lexington	F	1	
France	WTA Roland Garros	F	1	
Italy	Challenger Parma	M	1	
3			3	

6. Darts

Country / Continent	League / Competition	M / F	Number of reports	Remarks
England/Netherlands	Modus Icon Live League	M	1	
1			1	

7. Volleyball

Country / Continent	League / Competition	M / F	Number of reports	Remarks
France	Ligue A	M	1	
1			1	

8. Snooker

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Russia	Six Red Spring Cup	M	1	
1			1	