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## Competition manipulation – national platform annual review 2021



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## 1. Introduction

By signing the European Council's Convention on the Manipulation of Sports Competitions<sup>1</sup> (Macolin Convention) in 2014, Switzerland has made a commitment to its international partners to cooperate and to implement effective measures. While coordination of the fight against competition manipulation and other policy issues are the responsibility of the Federal Office of Sport, the Federal Act on Gambling<sup>2</sup> assigns to the intercantonal authority (previously Comlot, from 1 January 2021 Gespa) the task of a "national platform" acting as reporting office. As such, Gespa 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 on it are offered in Switzerland (Art. 64(2) Gambling Act). Also the two lottery companies (Swisslos & Loterie Romande) are legally obliged to inform Gespa about any 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, or to lottery companies, sports organisations and reporting offices abroad, in accordance with legal requirements.

In its role as "Swiss national platform", Gespa is member of the Group of Copenhagen (GoC). The GoC is a network of national platforms that 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 are easily and safely shared 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 took up its work in 2020. In early October 2021, the Federal Council appointed the four Swiss representatives to the Committee of the Macolin Convention – among them Gespa's Deputy Director.

In Switzerland, Gespa as reporting office also in 2021 acted as 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 – and thus is once again in a position to present official data on match-fixing, in line with its legal mandate. This report provides a presentation and analysis of the information collected and in particular of 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 a key element in the fight against wrongdoing.

No sport is immune from manipulation. However, by heeding legal reporting obligations, organisations strongly indicate that they are serious about combatting sports competition manipulation.

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<sup>1</sup> SR 0.415.4.

<sup>2</sup> BGS, SR 935.51.

It must be emphasised that a suspicion reported does not in any way 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 authorities 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 explicable without having to assume manipulation (the change in odds for instance may be due simply to an important player’s being injured).

## 2. Sources of reports

In total, Gespa received **157 suspicion reports on 138 sports events**. There were thus more reports than in the previous year (2020: 125 reports related to 97 events), which may primarily be due to the relaxation of pandemic-related restrictions in sport. However, the number of reports has not yet returned to pre-pandemic levels (2019: 263 reports on 192 events). The majority of the reports were filed via the Group of Copenhagen network; their exact number is **49**, which shows that the international exchange was also intensified compared to the previous year (2020: 19 alerts). Numerous reports were further shared with Gespa by **GLMS<sup>3</sup>** (The Global Lottery Monitoring System), the world football association **FIFA** and **Sportradar**. GLMS filed **24**, FIFA **33** and Sportradar **22** reports.

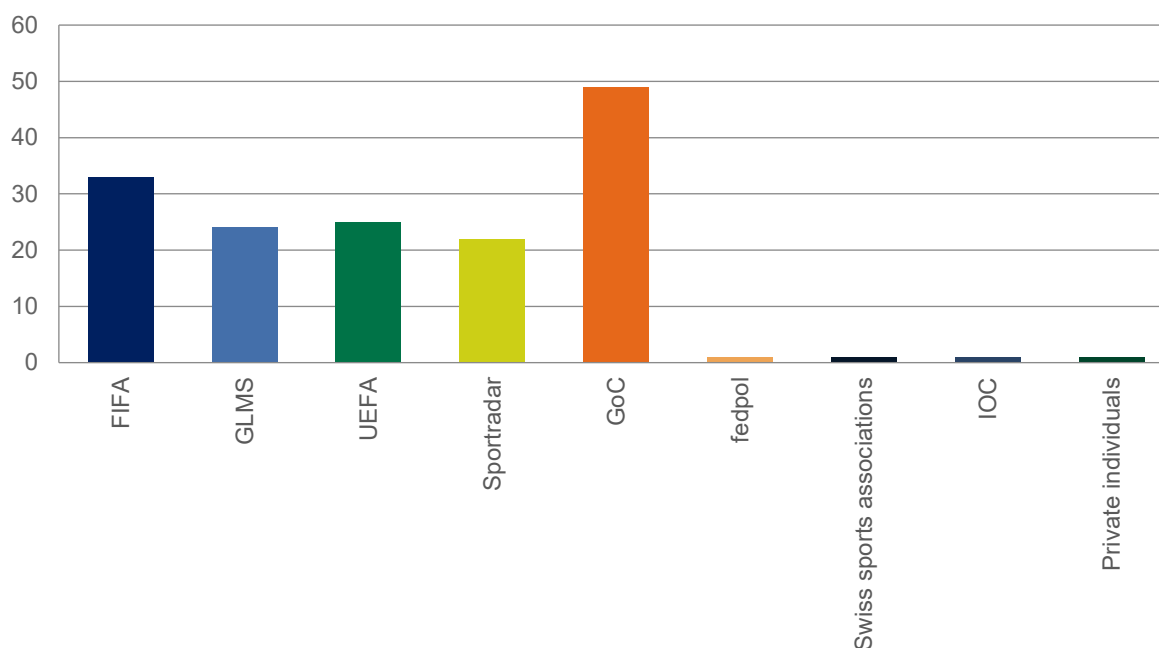


Fig. 1: Number of reports by source

Special mention deserves the clearly improved cooperation with UEFA, with whom talks were held in the previous year on compliance with the reporting obligation in accordance with the Gambling Act. With **25** shared reports, UEFA was among the most active observers in the year under review (2020: 4 alerts).

<sup>3</sup> GLMS was founded by European Lotteries (EL) and the World Lottery Association (WLA). It runs a monitoring system going by the same name, aimed at detecting and analysing suspicious betting activities.

The **International Olympic Committee (IOC)** filed only **one** single suspicion report with Gespa, despite being based in Switzerland and thus subject to the reporting obligation. According to its own statements, the IOC invests considerable resources in the fight against competition manipulation. It also operates its own system, the Integrity Betting Intelligence System (IBIS), which, among other purposes, is expressly designed to provide information to regulatory authorities and national platforms.

For various reasons, many of the Olympic competitions are of limited interest to the betting market, and turnovers are not remotely comparable with those of major football events. Accordingly, the risk of manipulation is lower. In any case, after the postponement of the 2020 Games to 2021, it is now clear that – regardless of the reasons – even in Olympic years the IOC is not going to play any central role when it comes to the exchange of information on concrete suspicions in connection with sports betting.

Further reports of possible manipulation Gespa received from the **Federal Office of Police fedpol (1)**, from a **Swiss sports association (1)** and from a **private individual (1)**.

It is important to note that legislation 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 contact of choice, being able to exchange suspicion reports with competent domestic and foreign authorities, in strict compliance with relevant data protection regulation.

### 3. Overview of reports received

See also the tables in the appendix.

#### 3.1 Sport

In 2021, Gespa received suspicion reports related to 138 sports events. Roughly 77% of the reports concerned **football (107)**. 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 the efforts of FIFA and UEFA in this regard.

**Tennis** follows with **17** alerts. This represents a great increase in reports compared to previous years (2020: 3 alerts; 2019: 1 alert). All alerts were shared with Gespa via the GoC network. Tennis has been struggling with the problem of fixing for a long time for various reasons. For one thing, for the majority of professional athletes, prize moneys do not cover expenses. 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 heightened. Nevertheless, as compared with football, Gespa received relatively few reports on tennis, which may be due not least 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 at this level.

However, the organisers of ITF tournaments in Switzerland are in principle subject to a legal reporting obligation.

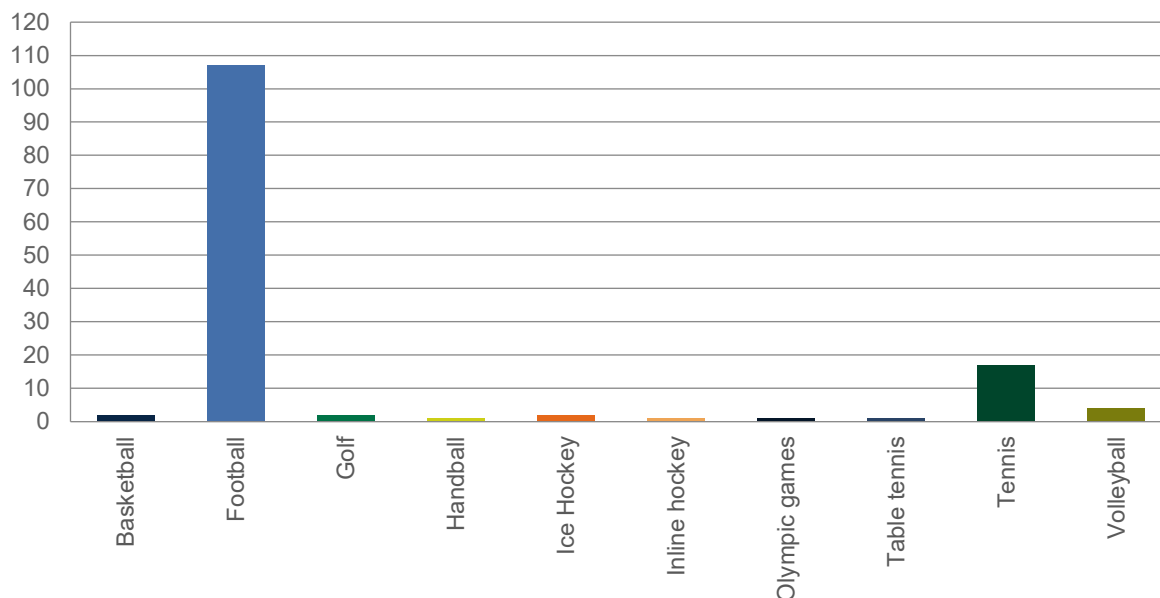


Fig. 2: Number of reports by sport

**Ice hockey (2)**, while popular in Switzerland, is relatively unimportant in many other countries. Ice hockey is fast and – particularly for laypeople – less predictable than other sports, which reduces its attractiveness on the sports betting market. Accordingly, the betting volume in ice hockey is significantly smaller than in football or tennis.

**Basketball (2), handball (1) and volleyball (4)** are less important in Switzerland than football, ice hockey and tennis, though basketball enjoys some popularity particularly in the French-speaking part of the country. In view of the fact that the lottery companies offer a fairly wide range of bets in these sports and that the respective international associations have their headquarters in Switzerland, the number of reports appears to be rather low.

Further reports received by Gespa in 2021 were related to **inline hockey (1), golf (2) and table tennis (1)**. The Swiss lottery companies are not permitted to offer bets on inline hockey games, and with regard to golf and table tennis, betting opportunities are very limited. Another report was filed in connection with the **Olympic Summer Games (1)**; however, this merely concerned the information policies regarding the general monitoring of the competitions rather than a specific suspicious case.

### 3.2 League/ranking

For various reasons (an important one being the economic situation of the clubs and athletes), competitions in lower leagues and rankings are more frequently manipulated than games in the popular top divisions and at major tournaments. This is one of the reasons why the Swiss lottery companies are allowed to offer betting only to a very limited extent on events in lower leagues; the aim is to help protect the integrity of sport and to make sports betting safer for Swiss consumers.

Accordingly, most of the reports received by Gespa concerned the national top divisions (**82**). **18** cases concerned games in second divisions, **13** were related to cup games. **10** reports concerned international competitions.

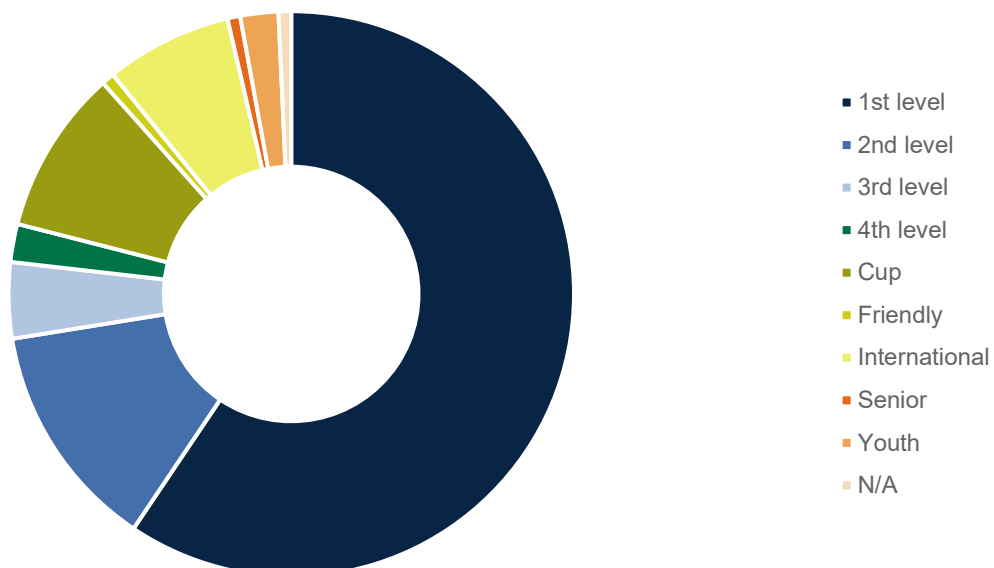


Fig. 3: Reports by athlete level

Federal law requires Swiss subjects to report suspicions to Gespa only if these relate to competitions which take place in Switzerland or on which bets are offered in Switzerland. Accordingly, the majority of alerts concern competitions on which bets can indeed be placed through the Swiss lottery companies. A list of permitted betting in Switzerland is available on Gespa’s website.

### 3.3 Athlete gender

The alerts received by Gespa in 2021 almost exclusively concern male athlete competitions. Of the 138 alerts, just 9 involved competitions with female athletes only. 2 reports concerned competitions with both male and female athletes. It should be noted that particularly in football, where the highest betting turnover is generated, much more betting is offered on men’s than on women’s games. In two cases it remained unclear whether the competition involved male or female athletes.

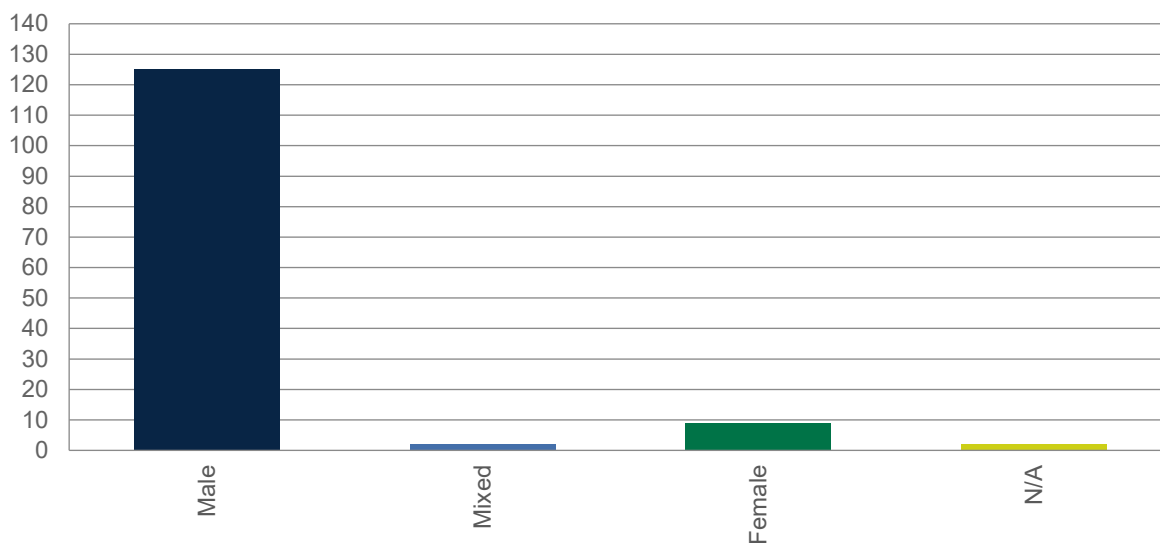


Fig. 4: Reports by athlete gender

## 4. Processing by Gespa

### 4.1 Law enforcement authorities

Law enforcement is basically the responsibility of the cantons. In order to ensure an efficient information flow, Gespa collaborates with fedpol, which acts as interface to the prosecution authorities and, where indicated, forwards cases to the cantons. As a rule, Gespa informs fedpol in summary form of all received reports after an initial triage has been completed. If a link to Switzerland seems possible on the basis of the triage process, Gespa provides fedpol with full documentation for the attention of the responsible cantonal authority; it 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 wider 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 2021, Gespa shared a total of 65 reports with its Group of Copenhagen partners, and was thus once again 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 2021, 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 world of sport returned to some degree of normality in 2021. After many competitions and championships were interrupted or cancelled in 2020 due to the pandemic, they could be held in more or less standard fashion again. This meant also renewed demands on Gespa and its efforts against competition manipulation, although the numbers of suspicion reports did not yet reach those of before the pandemic.

There were hardly any reports on bets on exotic sports that are not usually in the focus of betting providers and bettors. The same goes for the phenomenon of phantom games in which dubious providers offer bets on competitions that never take place.

Nevertheless, the betting market surely remains dynamic, and manipulators are always finding new ways to profit from dishonest behaviour. Accordingly, the efforts of the various institutions of the Macolin Convention, which provides a legally and politically well thought-out basis for combating manipulation, 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
Africa	Africa Cup of Nations	M	2	
Asia	Olympic Games	F	1	
Asia	FIFA Arab Cup 2021	M	1	
Europe	UEFA Euro 2020	M	2	
Europe	World Cup Quali.	M	1	
<b>5</b>			<b>7</b>	

African club tournaments

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Africa	CAF Champions League	M	1	
<b>1</b>			<b>1</b>	

Asian club tournaments

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

European club tournaments

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Europe	Champions League Quali.	M	1	
Europe	Conference League Quali.	M	6	
<b>2</b>			<b>7</b>	

Central American club tournaments

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Central America	CONCACAF League	M	1	
<b>1</b>			<b>1</b>	

Africa

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Egypt	Premier League	M	1	
Ghana	Premier League	M	1	
Tunisia	Ligue 1	M	3	
<b>3</b>			<b>5</b>	

Asia

Country / Continent	League / Competition	M / F	Number of reports	Remarks
China	Super League	M	2	
China	Division 2	M	1	
Israel	Ligat Haal	M	1	
Uzbekistan	Second League	M	1	
Vietnam	Championship U19	M	1	
<b>5</b>			<b>5</b>	

Europe

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Albania	Kategoria Superiore	M	1	
Austria	OFB Cup	M	3	
Bulgaria	Wtora liga	M	1	
Croatia	1. HNL	M	1	
Croatia	3. HNL	M	1	
Croatia	1. HNL U19	M	1	
Czech Republic	First League	M	2	
Czech Republic	FNL	M	1	
Czech Republic	CFL	M	1	
Czech Republic	Cup	M	4	
Czech Republic	Friendly	M	1	
England	Professional Development League	M	1	
Georgia	Erovnuli Liga	M	2	
Georgia	Erovnuli Liga 2	M	1	
Germany	3. Bundesliga	M	1	
Gibraltar	Eurobet Division	M	1	
Ireland	First Division	M	1	
Italy	Serie B	M	1	
Kazakhstan	Premier League	M	1	
Kosovo	Superliga	M	1	
Latvia	Virsliga	M	1	
Moldova	Divizia Nationala	M	1	

Netherlands	Eredivisie	M	3	
Norway	NM Cupen	M	1	
Russia	Premier League	M	6	
Russia	FNL	M	2	
Russia	2. Division	M	1	
Russia	Cup	M	3	
Slovakia	Fortuna Liga	M	1	
Slovenia	Nogometna Liga	M	1	
Spain	La Liga	M	2	
Spain	La Liga 2	M	1	
Spain	Segunda División RFEF	M	1	
Sweden	Superettan	M	1	
Sweden	Cup	M	1	
Ukraine	Premier League	M	1	
<b>36</b>			<b>54</b>	

#### North America

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Honduras	Liga Nacional	M	7	
Costa Rica	Primera Division	M	1	
<b>2</b>			<b>8</b>	

#### South America

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Bolivia	Primera Division	M	1	
Brazil	Brasileiro B	M	6	
Chile	Primera División	M	2	
Peru	Primera Division	M	6	
<b>4</b>			<b>15</b>	

#### 2. Ice hockey

Country / Continent	League / Competition	M / F	Number of reports	Remarks
France	Ligue Magnus	M	1	
International	World Championship	M	1	
<b>2</b>			<b>2</b>	

#### 3. Handball

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Europe	EHF Cup	F	1	
<b>1</b>			<b>1</b>	

#### 4. Basketball

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Hong Kong	Silver Shield Cup	M	1	
Turkey	BSL	M	1	
<b>2</b>			<b>2</b>	

#### 5. Tennis

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Argentina	ITF Cordoba	M	1	
Croatia	Losinj Challenge	M	1	
France	WTA Roland Garros	F	7	
France	ATP Roland Garros	M	3	
France	ATP Challenger St. Tropez	H	1	
Singapore	ATP Singapore	M	1	
Spain	UTR Pro Tennis Series	M	1	
Spain	Challenger di Las Palmas	M	1	
Turkey	ATP Challenger Istanbul	M	1	
USA	ATP Indian Wells	M	1	
<b>10</b>			<b>18</b>	

#### 6. Golf

Country / Continent	League / Competition	M / F	Number of reports	Remarks
England	Open Golf Championships	M	1	
Scotland	AIG Women's Golf Championships	F	1	
<b>2</b>			<b>2</b>	

#### 7. Volleyball

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Greece	A1 Ethniki	M	1	
Kazakhstan	Vysshaya Liga A	M	2	
Turkey	Efeler Ligi	M	1	
<b>3</b>			<b>4</b>	

#### 8. Table tennis

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Russia	Moscow Liga Pro	M	1	
<b>1</b>			<b>1</b>	

9. Inline hockey

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Switzerland	Nationalliga A	M	1	
<b>1</b>			<b>1</b>	