

Bern, 4 May 2023

Competition manipulation – national platform annual review 2022



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1. Introduction

By signing the European Council's Convention on the Manipulation of Sports Competitions¹ (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 Gambling² assigns to Gespa the task of a "national platform" acting as reporting office. In its latter role, 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 suspect 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 and 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 on 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 began its work. Gespa's Deputy Director has since been part of the Swiss delegation. Apart from Switzerland, Greece, Norway, Portugal, Moldova, Ukraine have ratified the Convention. In Iceland it should enter into force in the first half of 2023.

In Switzerland, Gespa as reporting office also in 2022 acted as hub for the exchange of information between sports organisations, lottery companies as betting operators, the institutions of the Macolin Convention, other international partners and the law enforcement authorities – and is thus once again in a position to present official data on match-fixing, according to 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 quality of its analyses. Rather, the aim is to set an example in an area where transparency is a key element in the fight against wrongdoings.

No sport is immune from manipulation. However, by heeding legal reporting obligations, organisations make a strong statement that they are serious about combatting competition manipulation.

¹ SR 0.415.4.

² BGS, SR 935.51.

It must be emphasised that a suspicion report does not in any way mean that manipulation has actually taken place. Reports point to 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. Even during Gespa’s initial assessment and triage, many cases (such as sudden significant changes in odds on the betting market) turn out to be explainable by other factors than manipulation (the change in odds for instance may be due simply to an important player’s being injured). The present report thus only depicts the quantitative aspect of the situation.

2. Sources of reports

In total, Gespa received **67 suspicion reports on 57 sports events**. These are significantly fewer reports than in 2021 (157 reports on 138 events) and also 2020 (125 reports on 97 events), when various pandemic-related restrictions were imposed on sport. The number of reports is still far from pre-pandemic levels (2019: 263 reports on 192 events). The annual numbers since the Federal Gambling Act’s entry into force are as follows:

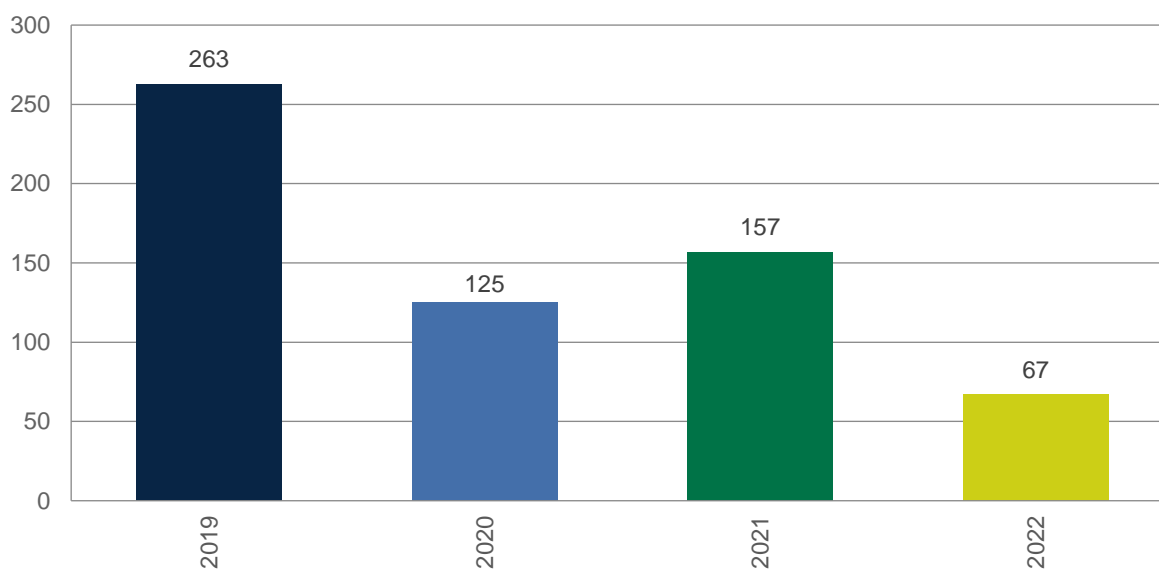


Fig. 1: Number of reports by year

There is no obvious reason for the decrease in reports. Surely the coordinated international efforts to combat manipulation are beginning to bear fruit – and manipulation is becoming more difficult. Since the obligation to report in applies predominantly to events on which betting is permitted in Switzerland, the range of events that were granted such permission surely will have an effect; Gespa’s respective list of sports, competitions and types of betting is regularly updated and available at www.gespa.ch. The latest figures suggest that the list contains no events that harbour an excessive risk of manipulation, which is good. However, it is also clear that the manipulators are adapting to the new conditions, and are trying

to stay below the radar of sports betting providers, sports organisations, monitoring companies and public authorities with various measures. In sum, several factors are likely responsible for the decrease in reports.

The majority of the reports filed with Gespa came from **Sportradar**³ with **19** reports. The number of cases reported by Sportradar thus remained relatively constant as compared with the previous year (2021: 22 alerts), despite the fact that the total number of reports decreased significantly. Numerous reports were further shared with Gespa by **GLMS**⁴ (The Global Lottery Monitoring System), the world football association **FIFA** and the **Group of Copenhagen** network. GLMS filed **16**, FIFA also **16** and the GoC network **11** reports.

UEFA shared significantly fewer reports with Gespa compared to the previous year, with a mere **2** alerts (2021: 25 alerts). It should be emphasised that UEFA has made a continuous effort to actively exchange information and has plausibly explained that there simply were no further suspicious cases with regard to the games on which betting may be offered in Switzerland. There are no indications that UEFA has neglected its legal duty to report.

One alert each was submitted to Gespa by the Swiss lottery companies, **Swisslos (1)** and **Loterie Romande (1)**. Also these organisations are legally obliged to report suspected manipulation in connection with sports events on which they offer betting (Art. 64(1) Gambling Act). Finally, one report was filed by a **private individual (1)**. An overview of all alerts according to source is provided on the next page in figure 2.

It is important to note that legislation fully allows the reporting of cases for which there is no legal reporting obligation (for example because no bets can be placed on the 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 domestic and foreign authorities, in strict compliance with data protection regulations.

³ Sportradar AG is based in Switzerland. The company collects sports data and processes them into digital content, thus acting as a service provider for sports media, the sports betting industry (betting odds) and international sports associations. Sportradar data also contribute to the fight against manipulation.

⁴ 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. GLMS changed its name to ULIS (United Lotteries for Integrity in Sports) at the end of 2022.

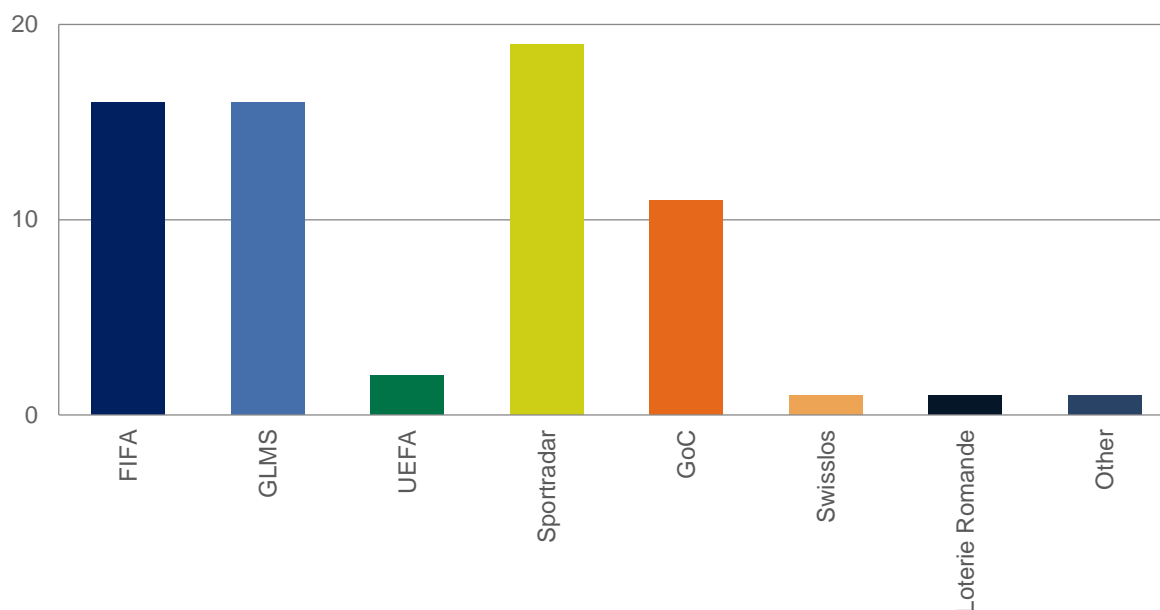


Fig. 2: Number of reports by source

3. Overview of reports received

See also the tables in the appendix.

3.1 Sport

In 2022, Gespa received suspicion reports related to 57 sports events. Roughly 88% of the reports concerned **football (50)**. The decrease in absolute numbers (2021: 107 alerts) is contrasted by an increased percentage of reports in this sport (2021: 77%). 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 active role and institutionalised handling of the issue on the part of the international football associations.

With 17 alerts, **tennis** ranked second in terms of suspicious activity reports in 2021. In 2022, the number of alerts decreased sharply (**1**) and returned to the level of earlier years (2020: 3 alerts; 2019: 1 alert). Tennis has been struggling with the problem of match-fixing for a long time due to various reasons. For one thing, for the majority of professional athletes prize moneys do not cover expenses. Also, 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. Nevertheless, Gespa received only a single report on tennis in 2022, probably not least for the following reasons: manipulations naturally occur (due to the lower prize moneys) at tournaments in the lower ITF

categories, on which the Swiss lottery companies – for just this reason – are not allowed to offer betting. 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.

Handball (2) and **volleyball (2)** are less popular in Switzerland than football, ice hockey and tennis. In view of the fact that the lottery companies offer a fairly wide range of betting in these sports and that the respective international associations have their headquarters in Switzerland, the number of reports appears (as in previous years) to be rather low.

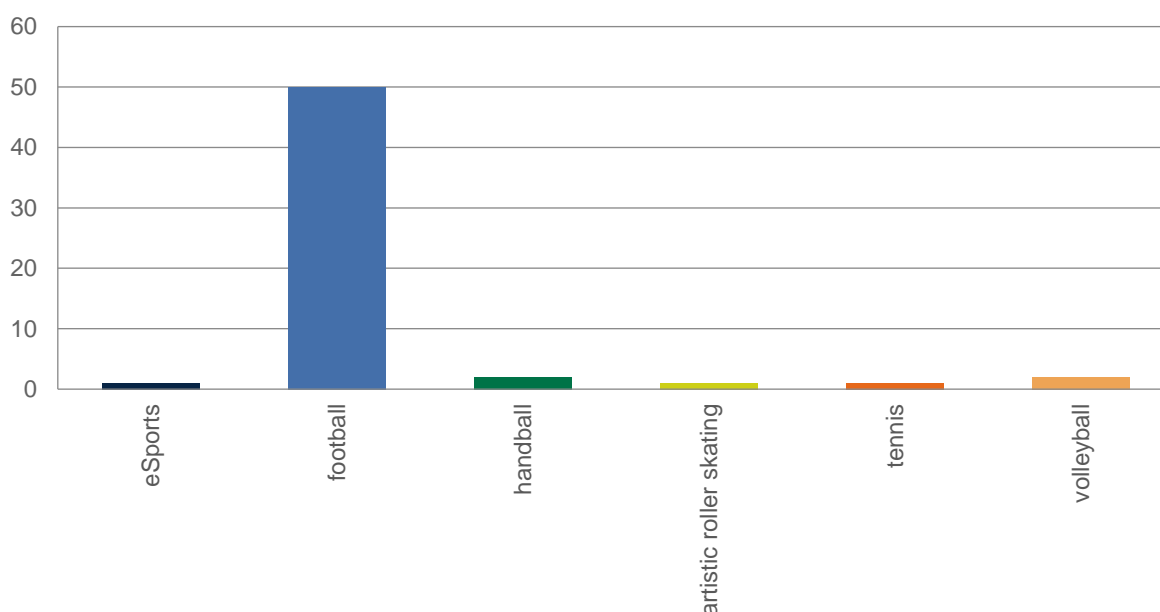


Fig. 3: Number of reports by sport

Further reports that reached Gespa in 2022 were on competitions in **artistic roller skating (1)** and **eSports (1)**. Artistic roller skating is a fringe sport on which the two lottery companies do not offer any betting. The popularity of eSports is growing – and with it the opportunities for betting on such events around the world. While the numbers of suspicious cases in other areas tend to decrease internationally, there are signs that they are rising markedly with eSports. At this point, it should be explicitly noted that Swiss lottery companies are not permitted to offer betting on eSports.

Other than in previous years, Gespa did not receive any reports in the year under review related to basketball and ice hockey. That there were no suspicious cases at all is rather surprising, given the popularity of these sports and the fact that the respective international associations are based in Switzerland.

3.2 League/ranking

For various reasons (an important one being the financial situation of the clubs and athletes), competitions in lower leagues and rankings are more frequently manipulated than games in the popular top divisions and major events with broad media coverage. This is one of the reasons why the Swiss lottery

companies are permitted 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.

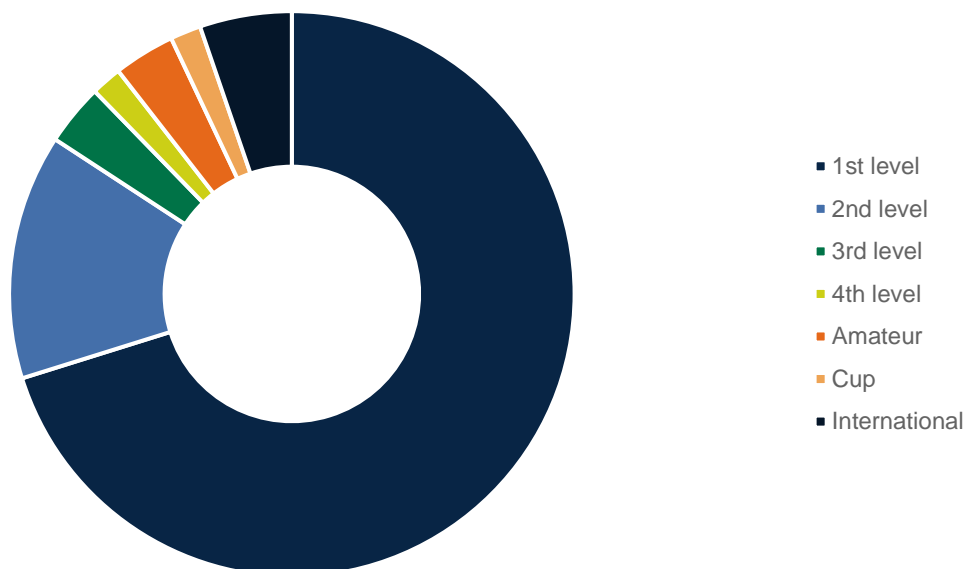


Fig. 4: Reports by athlete level

Accordingly, most of the reports received by Gespa concerned the national top divisions (**40**). **8** cases concerned games in second divisions, **2** were related to third and **1** to fourth division games. **1** report was on a cup game, **3** concerned international competitions. Another **2** reports were on amateur sport events, on which betting is not permitted in Switzerland.

Federal law requires Swiss subjects to report suspicions to Gespa only if these relate to competitions which take place in Switzerland or on which betting is offered in Switzerland. Accordingly, the majority of alerts concern events 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.⁵

3.3 Athlete gender

The alerts received by Gespa in 2022 once again almost exclusively concerned competitions with male athletes. Of the 57 alerts, just a single one was on an event with all-female participation. 1 report concerned an event 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 one case it remained unclear whether the competition involved male or female athletes.

⁵ <https://www.gespa.ch/en/fighting-illegal-gambling/manipulation-of-sports-competitions?highlight=manipulation>

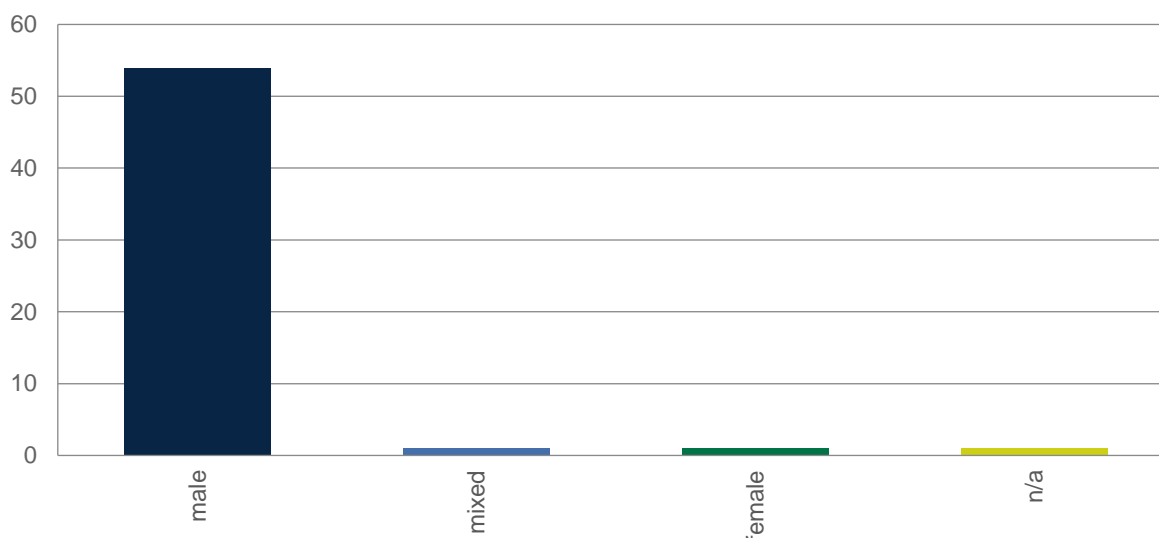


Fig. 5: Reports by athlete gender

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. Also in 2022 a constructive meeting between Gespa and fedpol staff took place. The information transfer process has once more been streamlined considerably; a more rigid triage at Gespa is intended to ensure that only cases with a clear link to Switzerland that might give rise to criminal proceedings in Switzerland are actually forwarded to the prosecution authorities.

4.2 Group of Copenhagen

If, in the course of the examination of a report by Gespa, a suspicion of manipulation grows stronger, and if there are no special circumstances that speak against forwarding, the report will be shared with the members of the Group of Copenhagen (GoC) via the Anti Doping Denmark (add) platform. The latter 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 several events in various countries.

In 2022, Gespa shared a total of 43 reports (2021: 65 reports) with its GoC partners and was thus once again by far the most active member of the group. A total of 54 alerts were shared on the platform. Gespa accordingly was responsible for around 80% of the reports circulated among the GoC's international partners. In the year under review, Gespa pleaded in the GoC for measures to encourage the exchange of reports also on the part of the other member countries. The group has decided to address the issue in 2023 and to think about appropriate measures.

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 initiated.

In 2022, there were no convictions in Switzerland for active or passive competition manipulation. However, as already mentioned, Gespa contributed importantly 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 can be excluded from betting if required. Also in this regard, the reports filed with Gespa and their careful evaluation are of central importance.

6. Concluding remarks

The world of sport largely returned to normal in 2022 after two years marked by the pandemic. After the difficult years with corona restrictions, competitions could be held normally again in the year under review. Surprisingly, this did not lead to an increase in suspected cases of manipulation. Possible reasons for the limited number of reports have been mentioned above. One thing is clear: the betting market 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 combatting 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

Asian club tournaments

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

Africa

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Egypt	Premier League	M	1	
Tunisia	Ligue 1	M	1	
2			2	

Asia

Country / Continent	League / Competition	M / F	Number of reports	Remarks
China	Super League	M	7	
South Korea	K3 League	M	1	
United Arab Emirates	League Cup	M	1	
3			9	

Europe

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Albania	Superliga	M	1	
Bulgaria	Parwa liga	M	3	
Italy	Serie B	M	2	
Kazakhstan	Premier League	M	1	
Kosovo	Superliga	M	2	
Poland	I Liga	M	1	
Poland	II Liga	M	1	
Poland	III Liga	M	1	
Slovakia	Fortuna Liga	M	1	
Spain	La Liga 2	M	1	
Sweden	Allsvenskan	M	1	
Switzerland	Super League	M	1	
Turkey	Süper Lig	M	2	
Wales	Various	M	1	
14			19	

US & Central America

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Honduras	Liga Nacional	M	7	
1			7	

Latin America

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Bolivia	Primera División	M	1	
Brazil	Série A	M	1	
Brazil	Brasileiro B	M	3	
Peru	Primera Division	M	17	
4			22	

2. eSports

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Switzerland	ESL League (Counterstrike)	M / F	1	
1			1	

3. Handball

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

4. Artistic roller skating

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Switzerland	Swiss championships	N/A	1	
1			1	

5. Tennis

Country / Continent	League / Competition	M / F	Number of reports	Remarks
India	ITF Mumbai	M	1	
1			1	

6. Volleyball

Country / Continent	League / Competition	M / F	Number of reports	Remarks
Finland	Mestaruusliiga	F	1	
Turkey	Efeler Ligi	M	1	
2			2	