

# NATIONAL COMPETITION MANIPULATION RISK ASSESSMENT 2021



The National Platform

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**Finnish Center for Integrity in Sports  
FINCIS**

ISBN: 978-952-5605-54-9

Layout: Max Salmi



# INTRODUCTION

This national risk assessment on competition manipulation has been created for the first time in 2021, under the leadership of the Finnish Center for Integrity in Sports FINCIS (later FINCIS) by a national platform set up by the Ministry of Education and Culture for 2020–2022. The purpose of this risk assessment is to identify the risks and vulnerabilities that concern Finnish sports and are central to combating competition manipulation. The risk assessment plays an important role in management and decision-making, as competition manipulation is a threat to sports organizations, the reputation of sports and the targeted sport itself. With the information provided in the national competition manipulation risk assessment, measures to combat the phenomenon can be improved significantly. With regard to the risk assessment, it is essential to identify both risk-increasing and risk-reducing factors. The report contributes to laying the foundations for the competition manipulation prevention programmes required of sports federations, and it also supports training and communication.

**Sports must be aware of the threat of competition manipulation, the associated sport-specific characteristics and the most effective control measures.** The ability to identify, resist, and report on competition manipulation is crucially important. Athletes and other actors in the field of sports should therefore have confidential channels and opportunities to report any issues and suspicious contacts they encounter.

Competition manipulation is not a new phenomenon in Finnish sports, but it has taken different forms over the decades. For example, as early as in the 1960s, at the end of the football season, there were doubts about match results being fixed for competitive reasons, and the betting-related pesäpallo match-fixing scandal in the 1990s brought the phenomenon to the Finnish public's attention. Since then, there have been some cases of competition manipulation by international and organized crime, particularly in football. **To prevent crime, all actors must take decisive action – especially the authorities.** It is the duty of the sports community to support the authorities in their work. On the other hand, the authorities must, in every situation, act in such a way as to promote the integrity of sports and to protect sports actors from criminal activity. The entry into force of the international agreements binding on Finland is one example of such action.

The 2020 coronavirus pandemic forced betting companies to face new challenges, as almost all sports series came to a halt simultaneously. “Ghost matches” created for manipulation purposes, i.e. matches that were not actually played at all, appeared on the world's suddenly empty betting lists. International police organizations have warned of the possible effects of the corona pandemic on competition manipulation. The Finnish police have not received any tips about potential ghost matches related to Finland. As the pandemic continues, sports clubs are likely to experience financial hardship, making them more vulnerable to criminal influence, for example linked to outside funding. This may also increase the risk of competition manipulation. In the informal network of national platforms, the Group of Copenhagen, it has been agreed that the national risk assessments of different countries should all follow the so-called Australian model. The model is based on the organized crime threat assessment method used by the Australian Criminal Intelligence Commission and a threat assessment method developed by the Canadian Mounted Police. **In the risk assessment, risk factors that threaten sports are scored. This includes international and illegal betting, international connections, the ability of sports to identify threats to integrity, and the commercial exploitation of sports for criminal activity.**

## COMPETITION MANIPULATION

Many different terms have been used to describe competition manipulation. The phenomenon has been called, among other things, match fixing, match and result manipulation and spot fixing. FINCIS' publication "Unfair result? – a report on the prevention of manipulation of sports competitions 4/2019" (Sopimaton lopputulokset – selvitys urheilukilpailujen manipulaation torjunnasta), provides information on competition manipulation as a phenomenon and its effects on sports. As a term, competition manipulation covers all sports-related manipulation types. The term 'competition manipulation' is also regularly used by, for example, the International Olympic Committee and the Interpol (IOC & Interpol 2016). According to the Council of Europe Convention on the Manipulation of Sports Competitions (2014) (CETS No. 215), competition manipulation is:

***“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.”***

According to Article 1 of the Convention, “the purpose of this Convention is to combat the manipulation of sports competitions in order to protect the integrity of sport and sports ethics in accordance with the principle of the autonomy of sport.” The main goal of the Convention is “to protect the integrity of sport and sports ethics”. It attempts to reach this goal through various measures aimed at identifying and preventing the manipulation of sports competitions. The objectives of the Convention shall be pursued by promoting international co-operation and monitoring compliance with the provisions of the Convention. The main points covered by the Convention can be classified as preventive and cooperative practices, authority action, information exchange and monitoring mechanisms. (European Commission 2017, 2-3; Council of Europe 2014, 4.)

In general, sport events are manipulated for either economic or sport-related reasons (Abbott & Sheehan 2013; Council of Europe 2018, 2-3; Haberfeld & Sheehan 2013; Spitz 2016; Tak et al. 2020). The possibility of political motives has been brought up from time to time. According to Europol, organized crime often chooses lower-level competition events as manipulation targets (Europol 2020, 2021). However, cases of competition manipulation have also occurred on higher levels, for instance in international matches (Abbott & Sheehan 2013; Dietl & Weingärtner 2012). Betting-based manipulation can be a form of or lead to money laundering and other corruption crimes.

## TYPOLGY OF SPORTS MANIPULATIONS

The Group of Copenhagen has developed a framework for the definition of competition manipulation in accordance with the Macolin Convention. It classifies various types of manipulation that may fall under the definition given in Article 3 of the Macolin Convention. It aims to provide a clearer definition of competition manipulation and a basis for the uniform collection of statistical information.

According to the framework, the basic structure has been created using a two-factor classification method:

- (i) the type of the manipulation
- (ii) criteria relating to the instigator(s) of the manipulation.

The three types of the manipulation of sports competitions are:

1. Direct interference in the natural course of a sporting event or competition i.e. deliberate manipulation by individual(s) involved in the event
2. Modification of an athlete's identity or personal information in order to influence the natural course or outcome of a sports competition
3. Modification that is non-compliant with criminal laws or sport rules relating to:
  - a) playing surfaces
  - b) equipment
  - c) athlete physiology
  - d) a sporting venue

These three types can then be further sub-categorised by using the following criteria relating to the instigator(s) of the manipulation:

- a) exploitation of governance
- b) exploitation of power or influence
- c) external influences
- d) opportunistic motive

Based on these classifications, the roles of different actors – instigators or facilitators, perpetrators of manipulation – and what happens on and off the field – how the attempted goal is achieved, why, and how the manipulation is carried out – can be described. (Council of Europe 2020)

## CONVENTION ON THE MANIPULATION OF SPORTS COMPETITIONS

In 2014, several European countries adopted the Convention on the Manipulation of Sports Competitions in Macolin, Switzerland. Finland, like 31 other countries, has signed the convention but has not yet initiated the ratification process. The Convention itself entered into force in 2019, and it has been ratified by seven countries by the end of 2020.

The purpose of the Convention is *“to combat the manipulation of sports competitions in order to protect the integrity of sport and sports ethics in accordance with the principle of the autonomy of sport.”*

Chapter 2 of the Convention calls for the development of national co-operation between sports and competition organizations and betting companies. It also recommends, among other things, that the above-mentioned stakeholders identify the risks associated with the manipulation of competition, increase training and awareness and develop good governance practices. Article 5 of Chapter II provides the following instructions on competition manipulation risk assessments:

***“Each Party shall - where appropriate in co-operation with sports betting operators, sports organisations, competition organisers and other relevant organisations - identify, analyse and evaluate the risks associated with the manipulation of sports competitions.”***

Chapter III focuses on the exchange of information. It states that the above-mentioned stakeholders shall, in accordance with international and national law, exchange information with each other and the authorities. Chapter III also covers the founding of a national platform and ensuring personal data protection. (Council of Europe 2014.)

## NATIONAL THREAT ASSESSMENT

The Ministry of Education and Culture has appointed an Advisory Board on Ethical Issues in Sport for 2020–2022 (Ministry of Education and Culture 2020). The board was appointed for the first time for 2015–2019 (Ministry of Education and Culture 2015). The advisory board acts as a co-operation body between the different branches of government and sports actors. It aims to promote ethics in sports and the implementation of related international agreements. In addition to the advisory board, the Ministry of Education and Culture has set up a national action group for the prevention of competition manipulation, which acts as the national platform under Article 13 of the Council of Europe Convention on the Manipulation of Sports Competitions (2014). The platform shall serve as an information hub, coordinate the fight against the manipulation of sports competitions, analyse information on irregular and suspicious bets, transmit information on possible infringements of laws or sports regulations to public authorities or to sports organisations and/or sports betting operators as well as co-operate with all organisations and relevant authorities at national and international levels.

FINCIS acts as the chairman and secretariat of the national platform, and the members are the Ministry of Education and Culture, the National Police Board of Finland, National Bureau of Investigation, the Southern Finland Prosecutor District, the Finnish Olympic Committee, the Finnish Football Association, the Finnish Football Players’ Union and Hippos. The national platforms, led by the Secretariat of the Council of Europe, form an informal co-operation network, the Group of Copenhagen. The aim of the network is to encourage the exchange of information, share best practices between the national platforms and to support the creation of new national platforms in countries where they do not yet exist. (Council of Europe 2017.)

## CREATION OF THE NATIONAL RISK ASSESSMENT

The preparation of the Finnish national risk assessment begun in spring 2020, and the information is based on an analysis of 19 sports, statements given by members of the national platform and separate statements given by Finnish coaches and Finnish sports bettors and the views of the athlete panel. In addition, the risk assessment takes into account the Europol (2020/2021) report on the involvement of organized crime in the manipulation of competition and a dissertation completed in 2020 at the University of Jyväskylä on the risks and identification of competition manipulation (Kyllönen 2020).

FINCIS sent questionnaires to the sports federations. Representatives of the federations were then interviewed based on these, mainly in the autumn of 2020. The aim was to highlight the unique factors related to each sport, as well as their potential vulnerabilities to manipulation and other crime. Their different cultures, cultural subtypes and societal activities were also considered. A major challenge in creating the threat assessment was to make it comparable between different sports, given the wide range of sports and their variety of special characteristics. In the future, all sports will be included in the competition manipulation threat assessment as part of sports ethics programmes, but for lower-risk sports, this will take the form of a simplified data collection without interviews. Federation-specific evaluations are not attached to this report, but they have been provided to the federations for information.

In order to assess the risks, it is important to identify, in particular, the extent of betting and the number and location of operators offering betting opportunities, as well as any involvement by organized crime. In the analysis phase, in addition to the factors mentioned above, the data were evaluated in relation to, for instance, domestic, Asian and worldwide betting. The biggest challenge in compiling a risk assessment is the difficulty of obtaining betting information. Exact figures are impossible to obtain, and therefore the information provided is based on estimates.

In the informal network of national platforms, the Group of Copenhagen, it has been agreed that the so-called Australian model will be used when compiling the risk assessment. The model is based on the organized crime threat assessment method used by the Australian Criminal Intelligence Commission and a threat assessment method developed by the Canadian Mounted Police. In the Australian model, risk factors that threaten sports are scored. This includes international and illegal betting, international connections, the ability of sports to identify threats to integrity, and the commercial exploitation of sports for criminal activity.

## CONNECTIONS BETWEEN INTERNATIONAL AND ILLEGAL BETTING AND FINLAND

There are a few sports in Finland that are larger international betting events, but no precise data is available on the extent of betting activities, only estimates. It can be assumed that, to a large extent, international betting follows Veikkaus' selection of sports that can be bet on, of which football is by far the largest in terms of turnover, followed by hockey. In order of magnitude, next on the list are tennis, basketball, e-sports, pesäpallo, winter sports, baseball, floorball, motor sports, snooker, equestrian sports, volleyball, athletics, American football and handball. The most interesting sports series in Finland in terms of betting is the Veikkausliiga football league, which is a betting event of about 300 betting companies worldwide. The average betting turnover for one match is approximately EUR 0.6 million, so the total betting turnover for 200 matches is about EUR 120 million, of which the profit margin is about EUR 12 million. The Kakkonen football league is a betting event for about 210 betting companies, and the average betting turnover per match is about EUR 0.45 million, so the total betting turnover for 400 matches is about EUR 180 million. In total, Finnish football generates approximately EUR 400 million in annual betting turnover. It is impossible to estimate the total amount of international betting on all Finnish sports. Europol estimates the value of global sports betting to be approximately EUR 1.69 trillion a year. The criminal benefit acquired through competition manipulation is approximately EUR 120 million (Europol 2020).

Veikkaus participates in continuous international cooperation in fraud prevention, especially with the Global Lottery Monitoring System (GLMS), whose members are national gambling companies in various countries. GLMS enables the continuous and confidential exchange of information on betting events between national gambling companies providing sports betting, which supports the acquisition of information related to the identification of manipulation attempts. GLMS observes and analyses the international betting markets on a global level, in particular radical betting odds fluctuations, and actively reports its findings to its members. Veikkaus forwards all GLMS findings concerning Finnish sports to FINCIS, which will, if necessary, bring them to the attention of the national platform. The information exchange also works similarly in the opposite direction. Veikkaus aims to limit its betting events to events and matches organized by reliable and responsible competition organizers, as well as series that have a reliable betting history and high-quality gameplay and are also the betting events of international betting operators on a global level. Careful target selection aims to ensure that no manipulated matches or competitions are offered as betting events.

As a general trend, it can be stated that, in recent years, the betting limits set by international betting companies have clearly tightened. This is especially true for the smaller series, which all series and leagues in Finland can be considered to belong to. As a result, it is becoming increasingly difficult for criminals to manage to bet the desired amount of money, and on the other hand, large bets cause stronger odds fluctuations, thus alerting the systems of companies that track manipulation attempts. Criminals engaging in competition manipulation are also likely to have learned to circumvent alert systems by placing smaller bets and using off-line bookmaker shops in the Asian black market.

Sport-specific assessments revealed that there is a possibility that individual players could manipulate competitions or matches. An example of a possible new group is, for example, domestic footballers who have lost their jobs or are in financial distress due to lay-offs. In terms of individual-related risk factors, it has been found that top athletes are particularly vulnerable to gambling and gambling problems (Grall-Bronnec et al. 2016). Of the matches played in Finland, football practice matches and the Kakkonen football league require special monitoring. Practice matches are generally overrepresented in competition manipulation cases, as verifying fraud is more challenging than in regular series matches. Clubs should film all their matches as potential evidence as well as publish the line-ups of practice matches in advance, so that, for example, betting professionals would be able to identify suspicious odds fluctuations more easily.

In accordance with section 42 of the Lottery Act (1047/2001), the Lottery Administration of the Police Board extensively supervises gambling activities in order to prevent crimes and abuses. With regard to sports betting, the Lottery Administration monitors, in particular, that Veikkaus Oy, which has the exclusive right to operate gambling activities in Finland, takes into account the prevention, deterrence and disclosure of manipulation of sports competitions when operating.

**In federation-specific estimates, the volume of international betting is generally low and does not pose a significant threat of competition manipulation. An exception to this is football, where international betting poses a high risk. For hockey and cricket, the risk is estimated to be elevated but medium level. For all other sports, the risk level is low. There is a chance that individual actors may engage in manipulation.**

## THE INTERNATIONAL CONNECTIONS OF FINNISH SPORTS

In this context, international connections refer, in particular, to foreign ownership arrangements at the club level. In the most interesting sport for betting, football, cases have occurred where foreign ownership has been linked to competition manipulation. These cases have had catastrophic results for the clubs. At worst, clubs that were already in financial difficulties before the involvement of foreign owners have gone bankrupt, and those in charge have been sentenced to various penalties.

*AC Allianssi, a football club from Vantaa, was transferred to foreign ownership in 2005. The new owners, suspected of being involved in organized crime, brought their own coaches and foreign players to the club. Subsequently, the club's matches were accompanied by suspicions of manipulation that did not ultimately lead to prosecution. The following year, the new owners left, but the club had so much debt that a league license was no longer granted to them. Later the same year, the club was closed.*

The Football Association of Finland has estimated that clubs facing financial difficulties are still more likely to seize tempting offers provided by foreign entities, such as foreign cooperation, co-ownership, investment, or getting players without compensation. It also seems that they are not always sufficiently critical of vague foreign “sponsors” approaching clubs in financial distress. There are also cases where players in the Finnish leagues have their salary paid by someone other than the club, although such “third party” salary payment arrangements are prohibited.

According to the Finnish Football Players’ Union, some football clubs that repeatedly face financial difficulties have lost their credibility by hiring several foreign players on short-term contracts. These clubs are not seen as long-term trainers of players, but rather as short-term operators that try to find solutions to their financial problems by any means. In these cases, foreign players are also often subjected to unnecessary suspicions of competition manipulation. From a player’s point of view, the situation may be quite problematic, as a player may engage in competition manipulation, while they may also be a victim of crimes, blackmail or threats. In the latter case, the victims may also be threatened with losing their ability to practice their profession as a result of (unjustified) disciplinary sanctions.

Risk factors related to clubs' financial difficulties, athletes' pay levels and payment practices have been identified in several studies. A poor financial situation often leads to pay cuts for the athletes and to late or missing payments. (e.g. Forrest et al. 2008; Hill 2010; IOC & Interpol 2016, 19; Spapens & Olfers 2015; Tarasti 2015; Trumpyte 2016).

**In federation-specific assessments, no significant foreign holdings in Finnish clubs were found. International ownership arrangements do not currently pose a significant threat of competition manipulation. For other sports, the risk is estimated to be low, while for football and basketball there is an elevated, medium-level risk.**

## THE SPORTS' ABILITY TO RECOGNIZE THE THREAT OF THE MANIPULATION OF SPORTS COMPETITION

The ability to recognize manipulation depends on training and the sharing of information. Any cases and suspicions that come up always increase awareness of the phenomenon, but training targeted at federation-level actors, clubs, athletes and other sports actors, such as referees and match supervisors, is essential. Often, the responsibility to provide training falls on sports federations, as well as the creation and development of various control mechanisms, such as the videotaping of sporting events, appointment of match delegates and the checking of the backgrounds of key actors before their activities begin.

The culture of each sport must strongly disapprove of and oppose competition manipulation at all levels. The situation is particularly problematic if a culture of manipulation has developed in a sport. This means that manipulation is so common that it is no longer detected or cared about. Organizing national competition or match events abroad or organizing international competitions in Finland both bring their own challenges to the identification of risks. In these situations, the monitoring mechanisms and practices may differ from standard national practices. Awareness of the amount and nature of betting makes it easier to assess the manipulation risk level. An important tool is the electronic monitoring of betting, which is carried out by several commercial companies, but also by national betting companies.

The Olympic Committee must ensure that its competition-organizing members have adequate regulatory means in place to address manipulation. As part of promoting good governance and responsibility, resistance to manipulation must be made visible in materials and communication.

In the view of the Football Players' Union, the most important thing from an individual player's point of view is the player agreement, which defines, among other things, what a ban on gambling means and what to do if someone contacts and suggests manipulation of football activities. In sports where there are no functioning sports or player associations, athletes are less aware of competition manipulation and the rules. In individual sports, even less information is provided than in team sports. One significant problem is that the information does not always reach athletes from abroad, as they often do not speak Finnish. The system should rely more on technical applications, such as Red Button.

According to the Football Association of Finland, one of the obstacles to combating the manipulation of competition in Finnish football is the attitude of some football players, who do not recognize the importance of the problem. Some do not want to admit the risks or do not understand them. A poor economic situation makes it attractive to hire foreign players that provide "good value for money" but are offered by vague representatives. Their background is often not sufficiently known, and investigations may be neglected due to ignorance or lack of interest. Clubs' payment difficulties, payment delays, pay cuts, ill treatment of athletes in matters such as housing, and fees paid by third parties make it harder to identify the risk of manipulation. So called double contracts with athletes are very risky. There are known cases where an agreement meeting the minimum requirements for obtaining a right of residence has been submitted to the authorities on behalf of a foreign player, but the actual contracts signed with the athletes have had significantly lower pay and poorer working conditions.

The Finnish Coaches' Association (Suomen Valmentajat ry) emphasizes that coaches have the opportunity to detect abnormal, manipulation-related behaviour in athletes. The coaches believe that an important form of cooperation is to increase awareness of the multidimensional nature of competition manipulation and to build a Finnish sports culture where no unethical phenomena around sports are accepted.

Veikkaus has football match observers in different parts of Finland. They regularly monitor the football teams in their area and report to Veikkaus during the game season as well as during the training season. In the event of any suspicion of fraud, the information included in the match observers' reports may be provided confidentially to FINCIS and the sports federation concerned and, where appropriate, to the authorities.

**Based on the evaluations of each sports federation, it can be stated that Finnish sports generally have good guidelines, rules and regulations, but their monitoring and enforcement is, at best, mediocre. The main reason for this is the lack of personnel. This is the biggest problem area in the prevention of competition manipulation. The monitoring-related risk is an elevated, medium-level risk for all sports.**

## THE EXPLOITATION OF SPORTS IN CRIMINAL BUSINESS ACTIVITIES

A factor that reduces the risk of competition manipulation in the operation of clubs or organizations is a healthy financial situation. Finances are significantly affected by conditions, the club's social culture and the attractiveness of the sport for both spectators and supporters. The transparency of good governance is enhanced by the openness of club ownership and sponsorship structures.

Police departments and the National Bureau of Investigation are responsible for detecting and investigating competition manipulation. Through instructions issued in 2020, the National Police Board of Finland has set up a network of officers acting as contact persons for the prevention, detection and investigation of bribery and other corruption crimes. Competition manipulation is viewed internationally as a form of sports-related corruption. In terms of competition manipulation, the National Prosecution Authority is an actor that only steps in when there is reason to suspect a crime and the pre-trial investigation authority initiates a pre-trial investigation. The prosecutor performs his or her duties in the case by cooperating with the pre-trial investigation authority provided for in the Criminal Investigation Act during the pre-trial investigation, handling the consideration of charges and prosecuting the case. The prosecution authority can prepare for possible future cases by providing more information and training related to the phenomenon of competition manipulation.

The National Police Board of Finland has estimated that the improvement of the coronavirus epidemic situation in the near future does not necessarily mean a return to the previous situation with regard to sports competitions and betting. It is therefore necessary to identify the growing importance and related manipulation risks of various forms of competition, such as e-sports, in particular in the prevention and monitoring of betting-related competition manipulation.

*In 2011, it was found that the football club Tampere United had received EUR 300,000 from a foreign financier that was connected to betting fraud and money laundering. Due to suspicions related to the investment, the club was banned from all official competitions of the Finnish Football Association, and the club was declared bankrupt in the same year. Police suspected the club's leadership of money laundering and two of them were sentenced to probation in the Court of Appeal. International organized crime sought to gain control of the club, with devastating consequences.*

**Federation-specific sports evaluations did not uncover any connections between sports and criminal business activities. On an international scale, there is not a lot of money circulating in Finnish sports, which means that there are few opportunities to exploit sports for criminal activities. It is estimated that football is the only sport where there is an elevated, medium-level risk in terms of the involvement of organized crime. For all other sports, the risk level is low.**

## CONCLUSIONS

In Finland, the situation with regard to competition manipulation is calm, and it is better than in several neighbouring countries. Plenty of good cooperation has been established between the various stakeholders in order to detect and combat competition manipulation, and this work must continue in the future.

In 2019–2020, FINCIS has not been informed of any serious suspicions of competition manipulation in Finland that would have led to a preliminary investigation or a sports-based investigation. Also, based on inquiries made by the Finnish Sports Betting Association (Suomen Urheiluvetoonlyöjät ry) in December 2020, its members did not observe any clear cases of competition manipulation in any Finnish sport in 2020, in which sports betting or gambling could have been the motivating factor. In addition, there are several sports in which no suspicion of manipulation has emerged. For example, according to Hippos, there have been no indications of manipulation in the trotting races for at least five years. In equestrian sports betting, the biggest threat is the misuse of inside information. On the other hand, in football, for example, manipulation has become more and more situational (spotfixing), which has made it more difficult to detect.

Based on the federation-specific assessments and the statements used in the assessments, it can be stated that Finnish sports are not currently exposed to a significant threat of international organized crime related to competition manipulation. Finnish sports do not have serious links to criminal activities. An increased risk as a result of international betting is only present in a few sports: football, hockey and cricket. From the sports federations' point of view, the lack of monitoring of rules, regulations and policies poses the biggest challenge to the prevention of competition manipulation.

Finland has a functioning national platform, and the investigation and study of ethical issues in sport is centralized and handled by FINCIS. This is an internationally recognized model, and it has been applied in various countries. The Olympic Committee has stated that it will promote this model to the International Olympic Committee, among others.

**There are a number of important recommendations for combating the manipulation of sports competitions that have been highlighted in this report.**

A national action plan against the manipulation of competition must be drawn up based on this risk assessment.

FINCIS will expand its anti-doping programs to combat competition manipulation. This risk assessment has helped in determining the competition manipulation prevention programme criteria, on which the organizations' programmes will be based. The organizations will define the measures to be taken, the persons in charge and the areas for development in their own programmes. **FINCIS will evaluate both the organizations' programmes and their implementation every four years and report the results to the Ministry of Education and Culture.**

The national risk assessment must be updated regularly, and in order to implement it, the sports federations must appoint persons who record the suspicions of competition manipulation arising in their sport and report them to the national platform through FINCIS. **The contact persons shall form a network, and they must have sufficient expertise to identify suspicions and cases of competition manipulation.**

The authorities' ability to investigate, prosecute and, where necessary, punish those participating in competition manipulation is important if no other alternatives are available. The police are in favour of the legislation being reviewed in order for the authorities to be able to respond effectively to competition manipulation (sports corruption). From the point of view of investigation and prosecution, the shortcomings of the current legislation pose challenges. **Although various views have been expressed on the possibility of applying fraud law to cases of manipulation, there is a need for specific legislation on sports fraud, and its creation should be encouraged.**

International co-operation plays a central role and, for example, the international central police authorities Europol and Interpol are active in the fight against corruption in sport. **The Finnish police must make full use of these channels.**

Competition rules and disciplinary rules shall be up to date, and they must be implemented correctly. In addition to the prohibition of manipulation, it is important that the competition rules mention the ban on sports players betting on their own and related sporting events, as well as the ban on sharing so-called inside information for use in betting. **The situation has improved with the National Olympic Committee's model rules, but there are still sports that have outdated rules on competition manipulation.**

The training and education of athletes and sports actors is important because awareness of the problem cannot arise through disciplinary standards alone. Clubs, players' unions and sports associations play an important role in educational work. **The Finnish Football Players' Union is a pioneer in implementing training for players, but the athlete panel still found that athletes have little knowledge of the rules and regulations related to competition manipulation, and betting in particular. The clubs should offer more internal training and guidance.**

FINCIS has increased competition manipulation prevention training in connection with anti-doping training. **During 2021, online competition manipulation prevention training will be published, which will improve the situation significantly.**

All actors must have a protected and secured method of sharing their findings and information. **FINCIS' ILMO service is a functional notification channel and awareness of it must be improved.**

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