

# NATIONAL COMPETITION MANIPULATION RISK ASSESSMENT



2024

National Platform against  
manipulation of sports competitions



**National competition manipulation risk  
assessment 2024**

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sports competitions**

**Finnish Center for Integrity in Sports FINCIS**

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## 1. INTRODUCTION

The national risk assessment on competition manipulation in 2024 shows the situation of manipulation of sports competitions in Finland. It has been prepared under the leadership of the Finnish Center for Integrity in Sports (hereinafter FINCIS) in a National Platform set up by the Ministry of Education and Culture for 2023–2027. In addition to FINCIS, the platform acts as a national information centre and coordinates actions against manipulation of sports competitions.

The purpose of the risk assessment is to identify the risks and vulnerabilities related to Finnish sports that play a key role in the prevention of competition manipulation. The risk assessment is relevant as a tool for management and decision-making, as manipulation of sports competitions is a threat to sports organisations, to the reputation of sports and to sport itself. The sports world must be aware of the threat of manipulation of sports competitions, the related sport-specific characteristics and the most effective prevention measures. The information obtained from the national risk assessment on competition manipulation can be used to further develop measures to combat the phenomenon. The ability to recognise, oppose and report manipulation of sports competitions is crucial. Manipulation is harmful to sports, regardless of whether it is carried out by individual sports stakeholders or organised crime.

In 2022–2023, sports organisations drew up Fair Competition programmes in which the organisations committed to the prevention of competition manipulation. Through these programmes, organisations have updated their rules on manipulation of sports competitions, increased training and communication on the subject, and improved their ability to identify and combat the phenomenon.

Combatting crime requires decisive measures from all sports stakeholders, but especially from the authorities. It is the duty of the sports community to support the authorities in this work. On the other hand, the authorities must act in all areas in such a way as to preserve the integrity of sports and protect sports stakeholders, in particular against betting-related crime. The global annual betting turnover of the biggest Finnish ball game series is approximately EUR 3.73 billion.

The Ministry of the Interior launched a legislative project on the reform of the gambling system in 2023. In accordance with the Government Programme, the project prepares the deployment of a licence system for gambling. The National Platform has discussed the gambling reform and its possible impacts on the prevention of competition manipulation at several meetings. Restrictions on the exchange of information between the sports community and authorities as well as the national betting company is the biggest obstacle to more effective prevention of competition manipulation. In addition, the shortcomings in the Criminal Code, particularly in relation to sports fraud, have been identified as a problem.

**The risk assessment is based on assessments of the risk factors that threaten Finnish sports, including international and illegal betting, international sports connections, the ability of sports to recognise manipulation of sports competitions and the commercial exploitation of sports for criminal activities.**

## 2. MANIPULATION OF SPORTS COMPETITIONS

According to the Council of Europe Convention on the Manipulation of Sports Competitions (CETS No. 215), the so-called Macolin Convention<sup>1</sup>, manipulation of sports competitions means:

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

According to Article 1 of the Convention, its purpose 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 objectives are to be achieved by promoting international co-operation and monitoring compliance with the provisions laid down in the Convention. The main points of the Convention can be thematically divided into prevention and co-operation practices, public authority activities, information exchange and monitoring mechanisms. The Convention and the associated international policies and measures provide the framework for this risk assessment.

In more general terms, manipulation of sports competitions may be betting- or sports-oriented. The aim of betting-oriented manipulation is to obtain direct or indirect financial gain through betting. Direct financial gain refers to the amount of money obtained through betting and indirect financial gain refers to the benefit obtained, for example, through money laundering. The aim of sports-oriented manipulation is to gain a competitive advantage through unfair means. The goal may be, for example, to win or lose a meaningful match or to avoid relegation or gain promotion.

<sup>1</sup> Council of Europe Convention on the Manipulation of Sports Competitions, Council of Europe Treaty Series - No. 215, Magglingen, 18.IX.2014

## Typology of manipulation of sports competitions

An advisory group under the Council of Europe, the Group of Copenhagen, has issued a framework for the definition of<sup>2</sup> manipulation of sports competitions under the Macolin Convention. It classifies the different types of competition manipulations that could fall within the definition provided by the Macolin Convention (Art. 3). Its purpose is to clarify the definition of manipulation of sports competitions and to promote uniform statistics.

According to the Typology Framework, the basic framework is structured using a two-factor classification method:

- (i) the type of manipulation**
- (ii) the instigator of the manipulation**

The three types of sports competition manipulation are:

- 1. Direct interference with the natural course of a sports event or competition, i.e. intentional manipulation by persons participating in the event**
- 2. Changing the identity or personal data of an athlete in order to influence the natural course or outcome of a sports competition**
- 3. Illegal or non-compliant modifications relating to:**
  - a) playing surfaces**
  - b) sports equipment**
  - c) athlete physiology**
  - d) 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 a dominant position**
- b) exploitation of direct authority or influence**
- c) outside influences**
- d) opportunistic motive**

These classifications can be used to explain the roles of the different operators, i.e. instigators, contributors and executors, and what happens on and off the field, how the attempted aim is achieved, and why and how the manipulation is carried out.

<sup>2</sup> See more at <https://www.coe.int/en/web/sport/macolin-tools>



### 3. NATIONAL PLATFORM AGAINST MANIPULATION OF SPORTS COMPETITIONS

The Finnish Ministry of Education and Culture has appointed an Advisory Board for Ethics in Sport for 2023-2027. The advisory board will function as an enabler of co-operation between the various administrative sectors and sports stakeholders. Its objective is to promote ethics in sports and the enactment of related international agreements. In addition to the advisory board, the Ministry of Education and Culture has appointed, in accordance with the recommendations of the Macolin Convention, a national platform against manipulation of sports competitions, which serves as a national information hub, coordinates the fight against the manipulation of sports competitions, analyses information on irregular and suspicious betting, transmits information on possible infringements of laws or sports regulations to public authorities and sports organisations and/or betting operators, and co-operates with all organisations and relevant authorities at national and international levels.

FINCIS serves as the chair and secretariat of the National Platform and the members are: the Ministry of Education and Culture, the National Police Board, the National Police Board of Finland's Gambling Administration, the National Bureau of Investigation, the National Prosecution Authority, the Finnish Olympic Committee, the Football Association of Finland, the Finnish Ice Hockey Association, the Finnish Basketball Federation, the Finnish Football Players' Union and Veikkaus Oy.

The national platform also acts as a national contact point under Article 13 of the Macolin Convention. The NCPs, under the leadership of the Secretariat of the Council of Europe, form an informal co-operation network, the Group of Copenhagen. The aim of the co-operation network is to enhance the exchange of information, share best practices among the contact points and support the creation of new contact points in countries where there are no contact points yet. It has been agreed in the Group of Copenhagen that creating national risk assessments or making threat assessments involves the scoring of risk factors that threaten sports, including international and illegal betting, international sports connections, the ability of sports to recognise threats to integrity and the commercial exploitation of sports for criminal activities.

### 4. CREATION OF THE NATIONAL RISK ASSESSMENT

The first risk assessment concerning manipulation of sports competitions was issued by the National Platform in 2021. The risk assessment has been updated in 2024, with the information mainly based on statements from the members of the National Platform, as well as statements from the Finnish Coaches Association, Finnish Sports Bettors' Association and the athlete panel of the Athletes of Finland. In addition, the sports organisations' risk assessment, which they have carried out when drafting their Fair Competition programmes, have played a significant role in the preparation of the national risk assessment. The amount of bets placed on Finnish sports is based on data provided by Sportradar<sup>3</sup>.

#### Recommendations in the 2021 risk assessment

The 2021 risk assessment included ten recommendations for measures for the prevention of competition manipulation. Some of the recommendations have been implemented, while others are undergoing ongoing development.

Recommendation	Situation in 2024
Issuing a national action plan against manipulation of sports competitions	Ongoing.
FINCIS extends its anti-doping programmes to include programmes for the prevention of manipulation of sports competitions.	Completed.
Sports federations appoint a person responsible for the prevention of competition manipulation.	Completed.
Promoting the development of legislation related to sports fraud.	Ongoing.
The police increase their activity in international co-operation.	Ongoing.
Issuing a common code against manipulation of sports competitions to the sports community.	Ongoing.
Increasing athlete training organised by clubs.	Ongoing.
FINCIS publishes online training on the prevention of competition manipulation.	Completed.
Increasing awareness about FINCIS' ILMO service.	Ongoing.

<sup>3</sup> Sportradar AG is a multinational corporation with headquarters in St. Gallen, Switzerland, that collects and analyses sports data for bookmakers, national and international sports federations, and media companies.

## 5. LINKS OF INTERNATIONAL AND ILLEGAL BETTING TO FINLAND

In order to assess the risks, it is important to find out the amount of betting and the number and location of betting operators, as well as the involvement of criminal groups. In the analysis phase, the data was evaluated in relation to the aforementioned factors as well as to betting in Finland and elsewhere in the world. FINCIS has worked with Sportradar to obtain an assessment of international betting on Finnish sports. The betting turnover data provided below is for 2023. Sportradar AG is a multinational company that collects and analyses sports data for bookmakers, national and international sports federations and media companies.

There are a few sports in Finland that attract a significant amount of international betting. To a large extent, international betting follows Veikkaus' most interesting sports, of which football is by far the largest in terms of turnover, followed by ice hockey and horse racing. These three are followed by basketball, tennis, Finnish baseball, e-sports, winter sports, baseball, floorball, American football, handball, snooker, motor sports, athletics, volleyball, darts, boxing and golf.

Sportradar has examined the largest ball game series, football, ice hockey, basketball, volleyball, handball and floorball, which have a total annual betting turnover of approximately EUR 3.73 billion. The most interesting sports series internationally in terms of betting is the football league Veikkausliiga, which is targeted by around 350 monitored betting companies worldwide. The average international betting turnover per match is approximately EUR 7.74 million, which means an annual betting turnover of approximately EUR 1.32 billion. That is 0.18% of the global betting turnover for football. The total turnover of international betting on Finnish football (Veikkausliiga, Ykkönen, Kakkonen, Suomen cup, Kansallinen liiga) is over EUR 2.62 billion. China has the highest share of betting turnover (51%), followed by Russia (6%), Germany (5%) and Italy (4%). In Finland, the betting turnover from the Veikkausliiga football league during a season is approximately EUR 22.7 million.

The turnover of international betting on the Finnish Ice Hockey League is approximately EUR 474 million, which means the average turnover is approximately EUR 0.95 million. In Finland, the turnover is approximately EUR 71 million per season, or EUR 0.14 million per match. The Finnish Ice Hockey League (SM-liiga) is the most popular league among

Finnish bettors, with 16% of betting turnover coming from Finland, 13% from Russia and 12% from the United States. The bets placed on SM-liiga makes up for 1.48% of the international betting turnover for ice hockey. The total annual turnover of international betting on Finnish ice hockey (SM-liiga, Mestis and Women's League) is approximately EUR 581 million.

The international betting turnover for Korisliiga (the Basketball League) amounts to EUR 292 million, which translates into a betting turnover of EUR 1.37 million per match. The betting turnover for Korisliiga is 0.15% of the global basketball betting. The total international turnover for Finnish basketball (Korisliiga, Korisliiga Women, Ykkösdivisioona A and B) is EUR 420 million. The biggest share of the turnover comes from China (42%), followed by the United States (8%) and Russia (7%). In Finland, the betting turnover for the Basketball League is approximately EUR 3.8 million per year and approximately EUR 18,000 per match.

The international betting turnover for volleyball (men's and women's championship leagues) is EUR 71 million, which is approximately 0.3% of the global betting on volleyball. The biggest share of the turnover comes from China (44%), followed by Russia (11%) and Italy (5%).

In handball, the men's and women's championship leagues attract a betting turnover of approximately EUR 29 million, which is approximately 0.54% of the global betting on handball. The biggest share of the turnover comes from China (33%), followed by Russia (9%) and Germany (5%).

In floorball, the amount of international betting on men's and women's F Leagues is approximately EUR 9.3 million, which is approximately 15% of global floorball betting. The biggest share of the turnover comes from Sweden (26%), followed by Finland (22%) and the Czech Republic (13%).

**Table 1**  
**National and international betting on Finnish sport**

**Betting turnover, EUR million.**

Sport/Series	Per match	Per year	Total per sport	Share of the global betting market
Football Veikkausliiga	7,74	1 320	2 620	0,18 %
Kansallinen liiga (Womens Tier 1)	0,83	98,4	2 620	0,01 %
Ice Hockey Liiga (Men's League)	0,95	474	581	1,48 %
Women's League	0,061	11,1	581	0,03 %
Basketball Korisliiga (Men's Basketball League)	1,37	292	420	0,15 %
Women's Basketball League	0,59	80,4	420	0,04 %
Volleyball Championship League	0,21	40,6	71	0,3 %
Women's Championship League	0,17	30,4	71	0,22 %
Handball SM Liiga (Men's League)	0,13	25	25	0,54 %
SM Liiga (Women's League)	0,045	3,7	25	0,08 %
Floorball F League Men	0,027	7,25	9,2	15,7 %
F League Women	0,017	2	9,2	4,4 %

According to the Finnish Sports Bettors' Association, no betting behaviour clearly suggesting betting fraud was observed in Finnish sports series in 2023, despite the large number of bets placed. However, it is likely that some betting fraud by amateurs and players participating in the matches does take place, mostly in connection with lower tiers and lower-level activities. The sums involved are moderate compared to operations carried out by professional criminals. An international example is e-sports, where players have been known to bet against their own teams, but the bets have not significantly affected the odds in the betting market. The Finnish Sports Bettors' Association has pointed out that without sufficient and preventive legislative deterrents, Finland is still a potential target for betting fraud by professional criminals.

From the perspective of the Gambling Administration, actions against the manipulation of sports competitions are currently seen to focus on supervisory authority in order to guarantee legal security under the Lotteries Act and to prevent crimes and abuses. The Gambling Administration monitors gambling implemented by Veikkaus Oy, which means, in practice, that the company takes into account the prevention of manipulation of sports competitions in its operations, especially in its betting business.

## 5.1 Gambling system reform

The National Platform has discussed the gambling reform and its possible impacts on the prevention of competition manipulation at several meetings. Restrictions on the exchange of information between the sports community and authorities as well as the national betting company is currently the biggest obstacle to more effective prevention of competition manipulation in Finland. In addition, the shortcomings in the Criminal Code, particularly in relation to sports fraud, have been identified as a problem. The National Platform has estimated that with the forthcoming licencing system, the increased offering of online betting in more sports and at different tiers will mean an increase in the risk of competition manipulation in Finnish sport in general.

In connection with the gambling system reform, decisions should be made to determine the supervisory authority and its duties and competence, allocate sufficient resources to the supervisory authority and FINCIS, as well as ensure the smooth exchange of information, especially in the National Platform. Attention should also be paid to sufficient policing resources to prevent manipulation of sports competitions, especially in terms of the prevention of money laundering.

The supervisory authority must have sufficient and centralised powers to obtain from licence holders all the information necessary for the investigation and prosecution of offences related to sports fraud. The licence terms must also specify with sufficient accuracy the specifications and limitations of different bets. In connection with the gambling reform, it would be important to discuss and ultimately ratify the Macolin Convention, as it is closely linked to the reform, particularly through online betting, and in order to implement effective prevention of competition manipulation.

## 5.2 Gambling Advisory Board

In March 2023, the Government appointed a gambling advisory board for the period 2023–2027. According to the Decree on the Advisory Board, the task of the Advisory Board is to monitor and assess the achievement of the objectives of Finland’s national gambling policy laid down in section 1 of the Lotteries Act in order to maintain and strengthen the exclusive rights system. One of the tasks of the Advisory Board is to act as a channel for transmitting information on gambling policy between various authorities, stakeholders working on the negative consequences of gambling, gambling research and the prevention of competition manipulation, as well as the political parties represented in the Parliament. The advisory board’s expert organisation in the prevention of competition manipulation is FINCIS.

**In sport-specific assessments, the level of betting in international comparison is generally low and does not pose a significant threat of manipulation of sports competitions. The exceptions are football, basketball and ice hockey, which attract significantly more domestic and international betting than average. The gambling system reform is expected to increase the amount of betting in Finnish sport, which will increase the risk of competition manipulation. Removing barriers to information exchange, reviewing legislation and ratifying international agreements would be important responses.**

## 6. SPORTS COMMUNITY’S ABILITY TO IDENTIFY THREATS OF COMPETITION MANIPULATION

The ability to recognise manipulation depends on education and training. Cases and suspicions that come to light will always raise awareness of the phenomenon, but targeted training and education at the federation level, for clubs, athletes and other sporting actors, such as referees and match officials, is essential. Training is often the responsibility of sports organisations, as is the creation and development of various control mechanisms, such as the videotaping of sporting events, the appointment of match officials or background checks on key stakeholders before the start of an activity.

In each sport, the approach must be one of strong disapproval and rejection of competition manipulation at all levels. The situation has gotten particularly bad if a culture of manipulation has developed in the sport, i.e. manipulation is so common that it is no longer noticed or cared about. Organising national competitions or matches abroad or international competitions in Finland poses its own challenge for risk identification. In these situations, control mechanisms and practices may differ from established national measures. Awareness of the volume, nature and targets of betting helps to understand the level of risk of manipulation. An important tool is the electronic monitoring of betting, carried out by commercial companies, but also by national betting companies.

### 6.1 Fair Competition Programme

FINCIS coordinates the Fair Competition Programme, which is part of the responsibility programme covering the entire Finnish sports community. The Fair Competition Programme includes an anti-doping programme and a programme for the prevention of manipulation of sports competitions. By adopting the programmes, sports stakeholders align with and commit themselves to mutually agreed measures for fair competition. FINCIS evaluates the organisations’ programmes and their implementation and reports them to the Finnish Ministry of Education and Culture. The evaluations are taken into account when making decisions on sports organisations’ state subsidies. The sports organisation’s own values form the basis for the programme, and the objectives and supporting measures revolve around these values. Each organisation’s programme is different, taking into account the special characteristics of the sport, the number of participants and the circumstances. The key aspects of the programmes relate to the up-to-date nature of the codes of conduct, the ban on betting, concrete training and education plans, an up-to-



date risk assessment and designated contact persons for training, communications and measures. In addition to the sports organisations' own websites, their programmes are published as links on the FINCIS website.

From the sport-specific assessments carried out in connection with the programme against manipulation of sports competitions it is clear that the ability of sports organisations to identify competition manipulation is the weakest link in terms of the risk assessment criteria. There is no significant difference between team and individual sports in this respect. With the programme, we have seen some improvement through increased training and communication. It can also be assessed that guidelines, rules and regulations in Finnish sport are generally at a good level, but there is room for improvement in their enforcement.

## 6.2 Comments from sports organisations

The Olympic Committee's role is to ensure that its members who organise competitions have sufficient means at the regulatory level to deal with manipulation. As part of promoting good governance and accountability, the fight against manipulation should be made visible in materials and communications.

The Finnish Football Players' Union emphasises the importance of preventive work in the prevention of competition manipulation. The Union continues its long-standing tradition of educating players to prevent match manipulation and distributes the Red Button app during changing room tours. For players, it is important that the rules on inside information sharing and betting bans are as clear as possible. The wording of player contracts and competition regulations must also be so clear and unambiguous that they leave no room for interpretation. This is also emphasised by the Ethical Panel of Athletes of Finland. Legal design processes should be enhanced in sports in the coming years, so that young athletes who have read fewer contracts and rules can better understand what they are committing to. Athlete contracts, player contracts, competition regulations and all rules concerning athletes should be so clear and unambiguous that they leave no ambiguity or room for interpretation.

According to the Football Association of Finland, one of the obstacles in the prevention of competition manipulation in domestic football is the dismissive attitude of some football stakeholders towards the problem. Risks are either denied or they are not understood. The poor financial situation of clubs makes it tempting to jump at even vague offers, without bothering to investigate the backgrounds of the players or

sponsors being offered in sufficient detail, if at all. It would be particularly important for the sports organisation that the forthcoming gambling reform should regulate the licence holders' selection of matches to bet on in order to allow for the arrangement of sufficient control measures.

The Finnish Coaches Association feels that compared to 2021, awareness of competition manipulation has increased, especially at the sports management level, as sports organisations, for example, have investigated the situation in their own respective sports and drawn up their programmes against competition manipulation. In addition, the Fair Win online training is increasing awareness and knowledge building, and the subscriptions by sports organisations to training on competition manipulation provided by FINCIS also significantly increased in 2023. The Finnish Coaches Association urges its members to take an absolutely negative attitude towards manipulation of sports competitions, and although awareness of the phenomenon has been raised, it should be at an even higher level. All in all, the Finnish Coaches Association considers the threat of competition manipulation in Finland to be very low at the moment in most sports and moderate in a few sports. However, one should be prepared for the contingency that the threat of competition manipulation may be growing. The threat is exacerbated by the financial pressures faced by organisations that arrange competitions, which can lead to problems with the payment of salaries to athletes and coaches, for example. The breaking down of Veikkaus' monopoly position and the resulting new opportunities for betting may also change the risk assessment on competition manipulation.

The Finnish Ice Hockey Association says that, in terms of betting, ice hockey is a smaller sport globally than certain other major sports and does not attract a significant amount of betting compared to the really global sports. Finnish lower-tier series are relatively seldom found on the betting lists in the international market. In Finland, Veikkaus only offers betting on the top two divisions for men and the top division for women. The transformation of ice hockey into a professional sport in the 1990s and the conversion of all the clubs on the two topmost tiers into limited companies and businesses has contributed to a huge increase in the capital involved in the ice hockey business. Today, the Finnish ice hockey licensing conditions include very specific requirements for the clubs to declare all outside capital down to the individual level. Ice hockey has so far managed well to avoid the potential pitfalls related to foreign ownership, among other things, but ice hockey's ability to recognise competition manipulation or the threat of it needs to be further improved. All matches in the top-tier series are subject to mandatory videotaping, so there is footage available on all matches.

In matches in the top two men's and the top women's series, there are also match commissioners. Training for them needs to be increased.

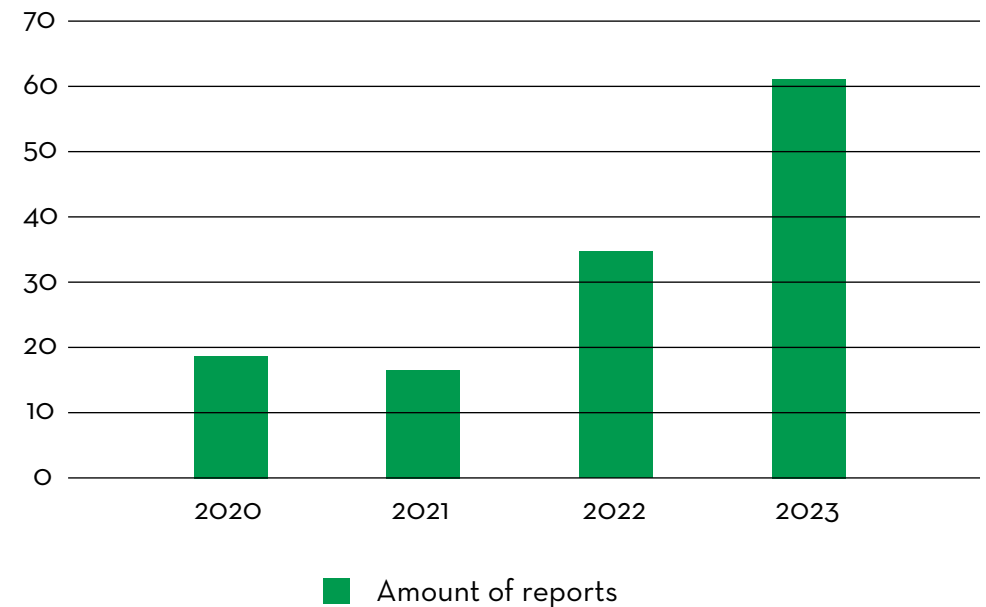
According to the Finnish Basketball Federation, the situation regarding manipulation of sports competitions is stable. Most of the occurrences of irregular betting have been found to have a natural explanation and have not led to further action. The biggest threat in basketball betting is in game formats that involve point differentials or total points scored in a match. The number of players in teams is smaller than in many other team sports, which highlights the importance of keeping inside information confidential. The Basketball Federation has sought to prevent competition manipulation by, among other things, requiring clubs to announce their match lineups on the league website on the morning of the match day and requiring players and officials in the men's and women's top divisions to complete the FINCIS's online course on the prevention of manipulation of sports competitions.

The number of competition manipulation cases reported to FINCIS has increased in the period 2020–2023. There are two main reasons behind this development. The biggest reason is the agreements (Memorandum of Understanding) concluded between FINCIS and international betting monitoring companies and the resulting data on irregular betting behaviour in Finnish matches or competitions. The second reason is the improved recognition of the phenomenon in sports organisations caused by the adoption of the Fair Competition Programmes. Reports have been received especially in judged sports which, however, do not involve significant betting. According to the reports received, people do not trust the objectivity of the judges because many of them have links to the clubs or sports organisations involved in the competitions.

## Table 2

### Cases of suspected competition manipulation reported to FINCIS in 2020–2023

#### Reports of competition manipulation to FINCIS



The number of reported cases of suspected manipulation of sports competitions shows an increasing trend. The main reasons are the increased ability of sports organisations to identify manipulation of sports competitions and FINCIS' co-operation agreements with companies that monitor international betting. For sports organisations and their ability to implement control measures, it would be important for the reform of the gambling system to include provisions on licence holders' selection of matches to bet on.

## 7. INTERNATIONAL CONNECTIONS OF FINNISH SPORT

In this context, international connections refer in particular to foreign ownership arrangements at the club level. In football, the sport of most interest to bettors, there has been no recent significant foreign ownership at the top tiers that has been found to be linked to manipulation of sports competitions. In amateur sports, ownership issues have been identified in connection with club ownership and management arrangements that are monitored by the National Platform from a competition manipulation perspective. In the past, sports stakeholders involved in the manipulation of sports competitions have gained control of clubs, which has had disastrous consequences for these clubs. At worst, clubs that were already in financial difficulties before the foreign owners arrived have gone bankrupt and those responsible have been held criminally liable.

**Historically, there have been arrangements in football that have been devastating for clubs. International ownership arrangements do not currently pose a significant threat of competition manipulation at the highest tiers of football, but arrangements suspected of being linked to manipulation of sports competitions have been identified at lower tiers. In other sports, no foreign ownership arrangements have been found to have increased the risk of manipulation of sports competitions.**



## 8. EXPLOITING SPORTS IN CRIMINAL BUSINESS

One factor that reduces the risk of manipulation of sports competitions for clubs or organisations is their sound finances. The circumstances, policies and the attractiveness of the activity for both spectators and sponsors play a key role in the finances. Accountability and good governance are enhanced by transparent ownership and sponsorship structures.

The police are involved in the detection and investigation of competition manipulation. The police have set up an anti-corruption network led by the National Bureau of Investigation, with representatives from all police forces. The network meets twice a year and discusses all current corruption issues at the national level. No issues or cases related to sports corruption have been raised in the network.

Manipulation of sports competitions is regarded internationally as one form of corruption related to sports. With regard to manipulation of sports competitions, the National Prosecution Authority is a sports stakeholder who steps in when there is reason to suspect a crime and when the pre-trial investigation authority initiates a preliminary investigation. A prosecutor carries out their duties in the case by co-operating with the pre-trial investigation authority during the preliminary investigation as provided for in the Criminal Investigation Act, by issuing a potential decision to prosecute and by prosecuting the case in court. The National Prosecution Authority can prepare for possible future cases by providing more training and education on the phenomenon of competition manipulation. A prosecution team has been set up in the Southern Finland prosecution area to deal with cases of manipulation of sports competitions. Through training and contacts with partners, the team aims to improve the capacity of the National Prosecution Authority to handle criminal cases related to competition manipulation. The Council of Europe's sports co-operation body, the Enlarged Partial Agreement on Sport (EPAS), has set up a Network of Magistrates/Prosecutors Responsible for Sports (MARS), which focuses on exchanging practices and experiences on sport-related crime with European counterparts. Finland has a representative in the MARS network.

**Overall, the amount of money involved in Finnish sport is low by international standards, which reduces the potential exploitation of sport for criminal activities. The amount of money involved in ice hockey, football and basketball is higher than in other sports. No organised crime or exploitation in criminal transactions is estimated to be involved in the top-tier series of these sports. However, situations can change quickly.**

## 9. CONCLUSIONS

There has been a lot of fruitful co-operation between different stakeholders to detect and combat manipulation of sports competitions. That work must continue in the future. However, limitations in the exchange of information between the sports community, the authorities and the national betting company create obstacles to a more effective fight against competition manipulation. In addition, the shortcomings in the Criminal Code, particularly in relation to sports fraud, have been identified as a problem. Manipulation is harmful to sports, regardless of whether it is carried out by individual sports stakeholders or organised crime.

The Fair Competition Programme for sports organisations has improved the ability of the sports community to identify competition manipulation, which has led to a higher number of reports to FINCIS. Some of the reports have involved judged sports which do not involve betting to a significant extent or at all. The responsibility for dealing with such suspicions and cases lies with sports organisations.

Co-operation with international betting monitoring companies has provided information on, among other things, irregular betting in amateur football series in 2023 and 2024. Suspicions of manipulation related to possible betting fraud have been dealt with by the National Platform and have led to requests for investigation by the police. In the same context, the Football Association of Finland has announced that it has referred to the disciplinary authority an allegation of competition manipulation involving three clubs, with international connections and organised activities involved in the case.

The National Platform has assessed that, as a result of the gambling reform, the increased availability of online betting in more sports and at different tiers means an increased risk of competition manipulation in Finnish sport in general, and that the removal of barriers to information exchange, revision of legislation and ratification of international agreements would be important countermeasures. The supervisory authority must have sufficient and centralised powers to obtain from licence holders all the information necessary for the investigation and prosecution of offences related to sports fraud.

Overall, the risk of manipulation of sports competitions in Finnish sports is low. In most sports, the amount of betting and the sums involved are low by international standards, although the annual betting turnover on the major ball game leagues is around EUR 3.73 billion. The biggest sports, ice hockey, football and basketball, are professional sports at

the top tiers and attract more betting both domestically and internationally. For these sports, the level of risk of manipulation of sports competitions has increased, although the top-tier series have not been linked to suspicions of organised crime or criminal exploitation in business. The biggest risks concern teams in the lower-tier series. They have been subject to a significant number of tips and suspicions of manipulated matches during 2023 and 2024.

## 10. RECOMMENDATIONS 2024

The National Platform is of the opinion that, in line with the preliminary report on the gambling system, the reform should define the supervisory authority, its tasks and its powers. In addition, sufficient resources must be allocated to both the supervisory authority and FINCIS, and the smooth exchange of information related to co-operation must be ensured, both between the supervisory authority and FINCIS and in the National Platform. Attention should also be paid to sufficient policing resources to prevent manipulation of sports competitions, especially in terms of the prevention of money laundering. To ensure effective preliminary investigations, national legislation must be adequate in accordance with Article 5 of the Macolin Convention.

The supervisory authority must have sufficient and centralised powers to obtain from licence holders all the information necessary for the investigation and prosecution of offences related to sports fraud. The licence terms must also specify with sufficient accuracy the specifications and limitations of different bets.


In connection with the gambling reform, it would be important to discuss and ultimately ratify the Macolin Convention, as it is closely linked to the reform, particularly through online betting, and in order to implement effective prevention of competition manipulation. The Macolin Convention contains a number of requirements, including substantive co-operation related to criminal law and enforcement, jurisdiction, criminal procedure, enforcement measures, sanctions and measures that interface with revisions required by the gambling reform.





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